

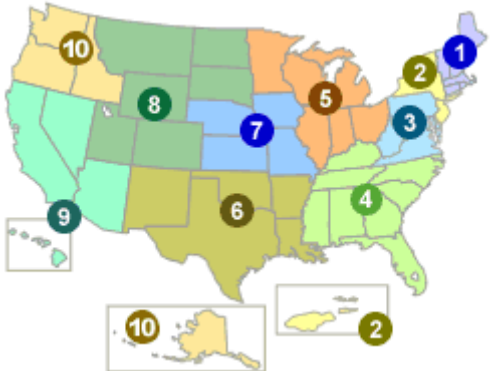
**United States  
Environmental Protection Agency**



# **MD 715 Report Fiscal Year 2013**

*Protecting Human Health and the Environment*

<b>EEOC FORM 715-01 PART A – D</b>	<b>U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT</b>			
<b>For period covering October 1, 2012 to September 30, 2013.</b>				
<b>PART A</b> Department or Agency Identifying Information	<b>1. Agency</b>		<b>1. U.S. Environmental Protection Agency</b>	
	1.a. 2 <sup>nd</sup> level reporting component		N/A	
	1.b. 3 <sup>rd</sup> level reporting component		N/A	
	1.c. 4 <sup>th</sup> level reporting component		N/A	
	<b>2. Address</b>		<b>2. 1200 Pennsylvania Avenue, NW</b>	
	<b>3. City, State, Zip Code</b>		<b>3. Washington, DC 20460</b>	
	<b>4. CPDF Code</b>	<b>5. FIPS code(s)</b>	<b>4. EP</b>	<b>5. 11</b>
<b>PART B</b> Total  Employment	<b>1. Enter total number of permanent full-time and part-time employees</b>			<b>1. 15,888</b>
	<b>2. Enter total number of temporary employees</b>			<b>2. 1,114</b>
	<b>3. Enter total number employees paid from non-appropriated funds</b>			<b>3. 0</b>
	<b>4. TOTAL EMPLOYMENT [add lines B 1 through 3]</b>			<b>4. 17,002</b>
<b>PART C</b> Agency Official(s) Responsible For Oversight of EEO Program(s)	<b>1. Head of Agency Official Title</b>		<b>1. Gina McCarthy, Administrator Environmental Protection Agency</b>	
	<b>2. Agency Head Designee</b>		<b>2. Robert Perciasepe, Deputy Administrator Environmental Protection Agency</b>	
	<b>3. Principal EEO Director/Official Official Title/series/grade</b>		<b>3. Vicki Simons, Acting Director Office of Civil Rights, SES</b>	
	<b>4. Title VII Affirmative EEO Program Official</b>		<b>4. Cynthia Burrows Acting Assistant Director for Affirmative Employment, Analysis Accountability</b>	
	<b>5. Section 501 Affirmative Action Program Official</b>		<b>5. Christopher Emanuel Disability Employment Program Manager</b>	
	<b>6. Complaint Processing Program Manager</b>		<b>6. Cynthia Darden Assistant Director for Title VII</b>	
	<b>7. Other Responsible EEO Staff</b>		<b>7. Mirza P. Baig National Affirmative Employment Program Manager</b>	
			<b>8. William Haig National Reasonable Accommodations Coordinator</b>	

<b>EEOC FORM 715-01 PART A - D</b>	<b>U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT</b>
<p align="center"><b>PART D</b> List of Subordinate Components Covered in This Report</p> 	<p><b>Subordinate Component and Location (City/State)</b></p> <p><b>Headquarters Program Offices</b> in Washington, DC; Research Triangle Park, NC; Cincinnati, OH; Las Vegas, NV  Office of the Administrator  Office of Administration and Resources Management  Office of Air &amp; Radiation  Office of the Chief Financial Officer  Office of Enforcement &amp; Compliance Assurance  Office of General Counsel  Office of the Inspector General  Office of International and Tribal Affairs  Office of Environmental Information  Office of Prevention, Pesticides &amp; Toxic Substances  Office of Research &amp; Development  Office of Solid Waste &amp; Emergency Response  Office of Water</p> <p><b>Regional Offices</b>  Region 1: Boston, MA  Region 2: New York, NY  Region 3: Philadelphia, PA  Region 4: Atlanta, GA  Region 5: Chicago, IL  Region 6: Dallas, TX  Region 7: Lenexa, KS  Region 8: Denver, CO  Region 9: San Francisco, CA  Region 10: Seattle, WA</p> <p><b>Program Labs:</b>  OAR/ORIA/NAREL: Montgomery, AL  ORD, NRM Research Lab: Ada, OK  ORD/NERL: Athens, GA  ORD/NHEER Labs:  Narragansett, RI  Gulf Breeze, FL  Duluth, MN  Corvallis, OR</p>

EEOC FORMS and Documents include in this report:			
*Executive Summary [FORM 715-01 <b>PART E</b> ], that includes:	X	*Optional Annual Self-Assessment Checklist Against Essential Elements [FORM 715-01 <b>PART G</b> ]	X
Brief paragraph describing EPA's mission and mission-related functions	X	*EEO Plan To Attain the Essential Elements of a Model EEO Program [FORM 715-01 <b>PART H</b> ] for each programmatic essential element requiring improvement	X
Summary of results of agency's annual self-assessment against MD-715 "Essential Elements"	X	*EEO Plan To Eliminate Identified Barrier [FORM 715-01 <b>PART I</b> ] for each identified barrier	X
Summary of Analysis of Work Force Profiles including net change analysis and comparison to RCLF	X	*Special Program Plan for the Recruitment, Hiring, and Advancement of Individuals With Targeted Disabilities for agencies with 1,000 or more employees [FORM 715-01 <b>PART J</b> ]	X
Summary of EEO Plan objectives planned to eliminate identified barriers or correct program deficiencies	X	*Copy of Workforce Data Tables as necessary to support Executive Summary and/or EEO Plans	X
Summary of EEO Plan action items implemented or accomplished	X	*Copy of data from 462 Report as necessary to support action items related to Complaint Processing Program deficiencies, ADR effectiveness, or other compliance issues.	X
*Statement of Establishment of Continuing Equal Employment Opportunity Programs [FORM 715-01 <b>PART F</b> ]	X	*Copy of Facility Accessibility Survey results as necessary to support EEO Action Plan for building renovation projects	N/A
*Copies of relevant EEO Policy Statements	X	*Organizational Chart	X

<b>EEOC FORM 715-01 PART E</b>	<i>U.S. Equal Employment Opportunity Commission</i> <b>FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT</b>	
<b>U. S. Environmental Protection Agency</b>	<b>For period covering October 1, 2012 to September 30, 2013.</b>	
<p><b>EXECUTIVE SUMMARY</b></p> <p><b><u>Agency Mission</u></b></p> <p>The mission of the United States Environmental Protection Agency (EPA or Agency) is to protect human health and the environment. EPA programs and activities are focused on protecting the air we breathe, the water we drink, and the places we live. To accomplish this mission, EPA partners with federal, state, and local stakeholders to enforce the nation's environmental laws and regulations; conducts world class research; provides financial assistance to state recipients and grantees in support of environmental programs; and employs a highly-educated and diverse workforce. Given the broad scope and critical importance of EPA's mission, it recognizes that meeting the multitude of responsibilities to the public can only be accomplished with a diverse, dynamic, and world-class workforce. To that end, EPA works vigorously to remove any identified barriers to equal employment opportunity and attract, hire, retain, and promote the most talented individuals in accordance with merit systems principles.</p> <p>EPA's Office of Civil Rights (OCR) in partnership with the Office of Administration and Resources Management (OARM), Office of Diversity, Advisory Committee Management and Outreach (ODACMO), previously the Office of Diversity, Outreach, and Collaboration, and the Office of General Counsel (OGC), are dedicated to developing and implementing programs to protect EPA's employees and applicants from employment discrimination.</p> <p>EPA is pleased to share this brief summary of the programs, activities, and accomplishments for Fiscal Year (FY) 2013, which document our efforts toward building and sustaining a model Equal Employment Opportunity (EEO) program based on the six essential elements identified by the U.S. Equal Employment Opportunity Commission (EEOC).</p> <p><b><u>Demonstrated Commitment from Agency Leadership</u></b></p> <p>In FY 2013, EPA leadership demonstrated their commitment to EEO. EPA's new Administrator, Gina McCarthy, took her oath of office in July 2013 and less than six months after her confirmation, she signed the EEO policy statement. The statement was signed on December 18, 2013, and issued on January 2, 2014. EPA's 2013 EEO policy statement prohibits discrimination based on race; color; religion; sex, including pregnancy, sex stereotyping, gender identity or gender expression; national origin; sexual orientation; physical or mental disability; age; protected genetic information; parental status; marital status; political affiliation; or retaliation based on previous EEO activity. The EEO policy statement also reaffirms the EPA's intolerance for any type of harassment - either sexual or nonsexual, and promotes the use of alternative dispute resolution (ADR) methods to resolve workplace disputes. The EEO policy statement advises employees and</p>		

applicants of their right to seek redress if they believe that they have been subjected to discrimination.

In FY 2013, EPA demonstrated that the entire Agency is responsible for civil rights. On May 1, 2013, EPA issued Order No. 4700 creating the Deputy Civil Rights Official (DCRO) position in each Assistant Administratorship (AAsip) and region. DCROs are senior leaders whose performance appraisals explicitly require them to work with OCR on national civil rights efforts as well as overseeing civil rights programs within their respective organizations.

EPA has a full-time National Reasonable Accommodation Coordinator (NRAC), who manages its National Reasonable Accommodation Program as a chief subject matter expert (GS 15). The NRAC works closely with collateral duty Local Reasonable Accommodation Coordinators (LORACs), who are assigned in every EPA region, Research Triangle Park (RTP), and Cincinnati Lab. Each coordinator is trained on the Agency's Reasonable Accommodation Procedure, which is based on the Rehabilitation Act of 1973, 29 U.S.C. §501 and 508, as amended. The in-depth training includes information about: 1) the reasonable accommodation request process; 2) the interactive process; 3) the importance of maintaining confidentiality and providing accommodations in a timely manner; and 4) union negotiated procedures. The LORACs, in close coordination with the NRAC, and Regional EEO and HR Officers, also provide a variety of training and assistance to managers and employees to ensure that requests for accommodation are processed in a prompt and judicious manner. For example, in FY 2013, 5 training courses throughout the regions and AAsips were provided, which were attended by 87 managers/supervisors and 25 employees. Furthermore, EPA continues to hold Senior Executives accountable for fostering diversity for all employees including those individuals with disabilities, pursuant to Executive Order 13548 through their performance appraisal.

In addition, both the NRAC and Assistant Reasonable Accommodation Coordinator (ARAC) serve as Co-Chairs of the Section 508 Executive Council. As such, they collaborated with the Section 508 Coordinator and developed a 2.5 hour training course for all managers/supervisors and employees. In FY 2013, the NRAC and ARAC conducted 31 classes attended by 270 managers/supervisors and 149 employees. The course was offered in Regions 1, 2, 4, 5, 6, 8, 10, as well as the Office of Environmental Information (OEI) Program Office. Additionally, attendees included managers/supervisors and employees from EPA labs, including RTP, Narragansett, Houston, Gulf of Mexico, Athens, Cincinnati, and Edison labs.

Information about how to file an EEO complaint is accessible to employees and applicants through EPA's intranet and internet sites. EPA policies on harassment and reasonable accommodation for qualified individuals with disabilities are discussed in courses that all new Agency supervisors are required to complete. Moreover, OCR continues to consult the EEO and Diversity Advisory Council (EDAC), which is comprised of subject matter experts from the Office of Civil Rights; Office of Human Resources; Office of Diversity, Advisory Committee Management and Outreach; and Office of General Counsel, on an as needed basis as OCR developed the FY 2013 MD 715 Report and planned activities.



In the summer of FY 2013, OARM established a Diversity and Inclusion Advisory Committee (DIAC). The DIAC operates as a standing subcommittee of the Human Resources Council and provides senior leadership oversight, counsel, and recommendations concerning EPA's diversity and inclusion efforts. The DIAC is comprised of a cross-section the agency's senior executives and key stakeholders, including Special Emphasis Program Managers (SEPMs), Non-Labor Employee Groups (NLEGs), EEO Officers, and Union representatives. The DIAC meets quarterly to address the effectiveness of EPA's diversity and inclusion efforts. The focus of the DIAC is to provide recommendations to OHR about what activities should be implemented to promote diversity and inclusion.

### Integration of EEO into EPA's Strategic Mission

In FY 2013, EPA regions and Administratorships (AAships) each created their own MD-715 Action Plans, which incorporated EEO, Human Resources, and Diversity initiatives. In addition, these Action Plans promoted the six essential elements of a model EEO Program, and the following five focus areas identified by OCR: 1) policies or procedures related to hiring, promotions, or retention; 2) efficient complaint processing; 3) special emphasis programs and outreach; 4) disability and Reasonable Accommodation Program initiatives and training; and 5) diversity and workplace best practices. Throughout FY 2013, OCR provided technical assistance visits for each region and AAship, in which feedback was provided on these Action Plans. Accordingly, each region and AAship FY 2013 Accomplishment Report, attached herein, provides a comprehensive look at EPA's zealous efforts to create a model EEO program.

EPA has eight Special Emphasis Programs (SEP) Council Chairs, led by four senior-level National Program Managers who share responsibility for the American Indian/Alaska Native Employment (AIANAC), Asian American and Pacific Islander Advisory Council (AAPIAC), Black Employment Program Advisory Council (BEPAC), Federal Women's Program Advisory Council (FWPAC), Women In Science and Engineering (WISE), Hispanic Employment Program (HEP) Advisory Council, Lesbian, Gay, Bisexual and Transgender Advisory Council (LGBTAC), Older Workers Program, and Persons with Disability Advisory Council (PWDAC). There are also Special Emphasis Managers in every region, AAship, and labs that work closely with the National Program Managers.

As part of EPA's FY 2013 Cross-Cutting Fundamental Strategy Action Plan, EPA committed to maintaining a talented and diverse workforce, providing employees with a flexible and collaborative work environment, and equipping them with the tools to work effectively in today's business environment. In accordance with this goal, ODACMO and OHR developed procedures to broaden opportunities for outreach and recruitment such as developing and issuing a consolidated list of coordinated Agency-wide participation in external outreach/recruitment events, and analyzed workforce participation in the Successful Leader Program to establish a baseline to evaluate the potential impact of further efforts to develop the existing workforce.

In FY 2013, EPA integrated EEO into its strategic mission. In FY 2013, ODACMO managed the completion of the Diversity and Inclusion Strategic Plan (DISP), which is effective from FY 2012 to 2016, and is based on three interrelated goals: 1) *Workforce Diversity*. Recruit from a diverse,

qualified group of potential applicants to secure a high-performing workforce drawn from all segments of American society; 2) *Workplace Inclusion*. Cultivate a culture that encourages collaboration, flexibility, and fairness to enable individuals to contribute to their full potential and further retention; and 3) *Sustainability*. Develop structures and strategies to equip leaders with the ability to manage diversity, be accountable, measure results, refine approaches on the basis of such data, and institutionalize a culture of inclusion. For example, in support of the DISP, activities were initiated throughout FY 2013 which included: 1) the creation of the DIAC, the cross-section of senior executives and key stakeholders to address the effectiveness of EPA's diversity and inclusion efforts; 2) the development of an enhanced diversity dashboard tool for workforce analysis and reporting; and 3) the oversight of senior leadership support and engagement with Special Emphasis program managers and employee resource groups. Together, these goals are intended to ensure a One EPA workplace that engages, utilizes and leverages the talents and contributions of all employees. It should be noted that the concept of One EPA was initiated by former Administrator Lisa Jackson in January 2010, and encompasses the following principles:

- Outcome Orientation: We focus on achieving extraordinary outcomes and connect our day-to-day actions to them.
- Alignment: We develop a shared understanding of problems and synchronize our efforts to implement solutions all can support.
- Relationships: We maintain strong, collaborative relationships inside and outside the Agency based on effective communication and mutual respect.
- Inclusiveness: We seek out diverse views and tools in building creative, integrated solutions.
- Ownership: The world views each of us as "EPA," so we feel ownership over the Agency as a whole and deliver on our promises to each other, the public and our mission.

In FY 2013, OCR, ODACMO, and the regions in collaboration with other agencies provided observance and commemorative events to broaden the understanding and appreciation of a diverse and inclusive work environment throughout EPA and the greater federal community. These events provide visibility to the respective groups and cultures, and present an opportunity to expand the conversation on related issues, goals and concerns. EPA officials and management took active roles in the events and employees were encouraged to attend. The national observances and commemorative months included: Disability Employment Awareness Month; American Indian and Alaska Native Heritage Month; Dr. Martin Luther King, Jr. National Birthday Observance; African American History Month; Women's History Month; Federal Inter-Agency Holocaust Remembrance Program; Asian American and Pacific Islander Heritage Month; Lesbian, Gay, Bisexual, and Transgender Pride Month; and, Hispanic Heritage Month.

In FY 2013, ODACMO also encouraged Regions and AAs to: 1) provide strategic and coordinated outreach to demographic groups with lower than expected representation; 2) leverage Minority Academic Institution (MAI) partnerships as an outreach tool; and 3) consider using the information contained in the Diversity Dashboard in developing and monitoring the effectiveness of targeted outreach strategies.



In FY 2013, OHR implemented a 2013 Memorandum of Understanding to create a formal partnership with Gallaudet University, an educational institution for the hearing impaired, through which OHR and OARM coordinated and organized the placement of 14 hearing impaired student volunteers at EPA's Headquarters Program Offices during the 2012-2013 school year.

### **Management and Program Accountability**

Management and program accountability for EEO is a commitment from the top down. Administrator McCarthy has renewed EPA's dedication to EEO by signing the EEO policy statement. Moreover, through EPA policies, training, and leadership actions, EPA communicates a clear and consistent message that managers and employees share a responsibility for creating a workplace in which discrimination is not tolerated.

To ensure accountability throughout civil rights programs in the regions and AAs, OCR conducted eleven Technical Assistance Visits with Regions and AAs to provide feedback on their FY-2013 Action Plans and enhance their development of planned activities to address triggers identified in prior MD-715 Reports.

To improve accountability over EPA's Senior Executive Service (SES), OCR has worked for many years to collect applicant flow data. In FY 2013, for the first time, the Executive Resources Division (ERD) captured applicant flow data for external applicants to SES vacancy announcements, which although not required by EEOC's MD 715 Instructions to agencies, will be a useful tool in the agency's efforts to evaluate the impact of its planned activities on all levels of selection. EPA is currently in the process of migrating to the Department of Interior National Business Center (NBC) HR Line of Business (LOB) system, which may include the capability to collect applicant flow data from internal SES candidates. This innovation would allow ERD to collect internal applicant flow data in 2014.

In FY 2013, EPA began collaborating with the Department of Interior (DOI) to take advantage of the Talent Management System, an extensive data system that maintains records of employee training activities. Specifically, EPA plans to implement the Learning Management Module component of the Talent Management System, which will allow EPA to offer a full catalog of training courses to all employees, track participation, and assist in employee development planning. EPA anticipates that the enhancement of the SES applicant flow data collection process, and the system to track training participation rates will further its ability to examine whether barriers to equal employment opportunity exist.

To improve accountability over EPA's career development programs, OHR and ODACMO started by collecting race/national origin and sex data of GS -13 through GS-15 supervisors who participated in the Successful Leaders program in FY 2012 and the first three quarters of FY 2013.. ODACMO conducted a limited baseline analysis, which is a preliminary step in EPA's efforts to determine what motivates employees to participate in the Successful Leader Program. According to their preliminary analysis, Asian, Black, Hawaiian/Pacific Islander, Hispanics and Two or More race Females had the highest participation rates in the Successful Leader Program. However, there was lower participation from White and Native American Males, and no participation from Native

American Females generally. EPA will continue to monitor participation in the Successful Leader Program.

EPA has an ongoing commitment to continue to include clear expectations about diversity and EEO in performance standards for managers. EPA has maintained SES standards that not only focus on preventing discrimination in hiring activities and promoting merit systems principles, but also require senior leaders to be personally involved in leading and implementing EEO and civil rights initiatives consistent with applicable law and executive orders. In addition, at the end of every performance cycle, the Director of OCR, Performance Review Board members, and Executive Review Board members evaluate management self-assessments to ensure that the respective rating is an appropriate reflection of the accomplishments listed.

### **Proactive Prevention of Unlawful Discrimination**

EPA is committed to proactively preventing unlawful discrimination throughout its workforce. In furtherance of this goal in FY 2013, the DCRO position was created in each AAship and region. As stated, the DCROs are responsible for the civil rights programs within their respective organizations, and provides senior level involvement in the development of national strategies and policies pertaining to civil rights. The DCROs, will in part, consistent with applicable laws, provide executive support in furthering the EPA's commitment to creating a workplace free of unlawful discrimination.

In the summer of FY 2013, OARM established the DIAC, which operates as a standing subcommittee of the Human Resources Council to address the effectiveness of EPA's diversity and inclusion efforts. The DIAC will proactively prevent unlawful discrimination by regularly reviewing diversity and inclusion efforts to ensure that they also prevent barriers to EEO.

EPA's NRAC plays an important role with respect to proactive prevention by working to provide guidance to managers and employees on the reasonable accommodation process, tracking any trends, and addressing challenges. EPA believes that a lack of training on and knowledge of their respective responsibilities would likely lead to an increase in mistakes and discrimination complaints. The NRAC regularly briefs the Director of Civil Rights and LORACs on compliance with written procedures. EPA has reviewed and updated its Reasonable Accommodation policies and procedures to ensure that they reflect provisions of the Americans with Disabilities Act Amendments Act (ADAAA). As part of the proactive efforts, the NRAC delivered five training courses throughout the regions and AAships, which were attended by 87 managers/supervisors and twenty-five employees.

In FY 2013, EPA enhanced its targeted outreach and recruitment activities by compiling a list of diverse recruiting sources for Shared Service Centers to broadly distribute EPA job announcements. This effort increases the probability that potential applicants from all race/national origin and sex groups will receive EPA job announcements, and be afforded an opportunity to participate in the application process, if they desire.

EPA also recognizes that employees' use of the EEO complaint process sometimes cannot be prevented. EPA emphasizes the use of ADR to assist the parties' efforts to resolve the concerns raised and to facilitate effective communication between them. EPA managers and supervisors are required to participate, absent extenuating circumstances, as reiterated by the Administrator in her 2012 annual EEO Policy Statement. By certifying and training more EEO counselors and providing informational materials about the benefits of ADR in print and electronically, EPA's ADR participation rate increased from 33.7% in FY 2012 to 49.41% in FY 2013. These efforts also increased EPA's rate of providing timely EEO counseling from 69.39% in FY 2012 to 92.11% in FY 2013.

### Efficiency

EPA recognizes the importance of efficiency with respect to EEO and is committed to achieving it. EPA has made appropriate resources available to ensure there is a sufficient number of EEO Officers, EEO Specialists, and Special Emphasis Program Managers across EPA so that EEO matters are handled in a timely and efficient manner – in total, there are over 75 full-time staff members and an additional approximate 75 collateral duty staff who help EPA administer its EEO and Diversity Programs.

EPA is constantly reevaluating its EEO/Title VII program to ensure that complaints of discrimination are handled in the most efficient manner possible. Throughout FY 2013, the EEO/Title VII program maintained its use of a complaint tracking software, IComplaints, which helped the staff to decrease its Final Agency Decision (FAD) issuance time by 61% and procedural letter issuance by 46%. Moreover, the EEO/Title VII team received two extensive trainings on FAD and procedural dismissal writing, which have enhanced the OCR staff's analysis capabilities and accordingly, the efficiency of the process.

In a further effort to expedite its investigation completion rate, OCR has eliminated the use of its contractor in drafting FADs because it found that allowing its two newly hired in-house attorneys to draft all FADs streamlined the process and produced higher quality analyses. EPA also required all investigators to attend its refresher EEO training. In addition, OCR maintained its Standard Operating Procedures (SOPs) to provide guidance regarding the way EEO cases are processed at EPA; the related SOP facilitates the transition of new staff into the office. It also identifies expectations for OCR staff regarding an anticipated time table for drafting and conducting the legal review of FADs. By the end of FY 2013, OCR also amended its statement of work with the contractor providing investigator services to include penalties where the contractor provides investigatory materials late.

EPA has also increased its efficiency by certifying and training 11 new EEO counselors. EPA EEO counselors were required to attend refresher courses in accordance with MD 110, which entailed mock counseling sessions, updates on EEO case law developments, and guidance from EEO professionals and attorneys. By virtue of these achievements, EPA has also noticed significant advancement in both the use and success rate for ADR. Last year, the ADR participation rate was 33.7% and this year it increased to 49.41%. The rate of providing timely EEO counseling also increased from 69.39% in FY 2012 to 92.11% in FY 2013.

The senior-level NRAC, in partnership with LORACs, also ensured that EPA's reasonable accommodation process ran efficiently. In particular, 95.5% of reasonable accommodation requests were processed within established timeframes in FY 2013 due to the NRAC's management. EPA also collects and maintains several applicant flow and workforce data in several databases that are accessible to OCR, ODACMO, and OHR to improve their efficiency in planning targeted activities to create a model EEO program.

In FY 2013, ODACMO provided EPA employees with the opportunity to update their race and national origin information. By increasing the accuracy of employee race and national origin information, this effort improved EPA's ability to determine whether barriers exist to equal employment opportunity in the Senior Grades.

EPA is pleased to participate on the Council of EEO and Civil Rights Executives and the Federal Interagency Diversity Partnership to share best practices and ideas on ways to enhance the work environment and the efficiency of EEO programs and activities. EPA benchmarks with other agencies to learn about successful programs and ways to enhance its Civil Rights Programs.

### **Responsiveness and Legal Compliance**

EPA is committed to ensuring EEO responsiveness and legal compliance. To ensure EEO responsiveness, EPA mandates managers and supervisors' participation in ADR, absent extenuating circumstances. Further, legal compliance is prioritized through EPA's timely adherence to EEOC administrative judge orders. OCR is responsible for compliance with EEOC administrative judge orders and provides documentation as requested by EEOC in a timely fashion. EPA's serious dedication to legal compliance is demonstrated by its inclusion of administrative judge responsiveness in the performance standard of the Assistant Director of Civil Rights for Title VII. In addition, EPA has systems in place to ensure that monetary or other relief is initiated efficiently.

In furtherance of EPA's commitment to legal compliance in all EEO areas, it has: 1) implemented training for all professionals that facilitate the EEO complaint process; 2) hired two in-house attorneys; and 3) completed an SOP. While EPA has reduced both its FAD and acceptance/dismissal letter completion times by 61% and 46%, respectively, it will address priorities set forth in the EEOC's feedback to EPA's FY 2012 MD 715 report to continue to improve.

### **Workforce Analysis**

#### ***Total Workforce***

At the close of FY 2013, EPA employed 15,888 (93.4%) full/part time permanent and 1,114 (6.6%) temporary employees for a total of 17,002 employees. This was a significant net decrease of 757 (4.5%) full/part time permanent employees and a net decrease of 296 (21.0%) temporary employees for a total net decrease of 1,053 (5.8%) employees compared to FY 2012. Males comprised 48.02% (7,629) of the permanent workforce as compared to 51.86% of the national civilian labor force (CLF). Females comprised 51.98% (8,259) of the workforce as compared to 48.14% of the CLF.

***Representation of Class Groups***

The data in Table A1 shows the workforce profile for permanent employees:

White men comprised 36.93% (5,868) of the workforce compared to 38.33% of the CLF.

White women comprised 30.98% (4,922) of the workforce compared to 34.03% of the CLF.

Black men comprised 4.60% (738) of the workforce compared to 5.49% of the CLF.

Black women comprised 13.44% (2,136) of the workforce compared to 6.53% of the CLF.

Hispanic men comprised 2.62% (417) of the workforce compared to 5.17% of the CLF.

Hispanic women comprised 3.24% (514) of the workforce compared to 4.79% of the CLF.

Asian men comprised 3.06% (485) of the workforce compared to 1.97% of the CLF.

Asian women comprised 3.23 % (513) of the workforce compared to 1.93% of the CLF.

Native Hawaiian men comprised 0.05% (8) of the workforce compared to 0.07% of the CLF.

Native Hawaiian women comprised 0.07 % (11) of the workforce compared to 0.7% of the CLF.

American Indian men comprised 0.28% (44) of the workforce compared to 0.55% of the CLF.

American Indian women comprised 0.43% (69) of the workforce compared to 0.53% of the CLF.

Two or More Races Men comprised 0.43% (69) of the workforce compared to 0.26% of the CLF.

Two or More Races women comprised 0.59% (94) of the workforce compared to 0.28% of the CLF.

EPA also collected information concerning its temporary employees which can be found in Tables A1 and B1.

At the close of FY 2013, EPA employed 196 (1.23%) full/part time permanent and 5 (0.45%) temporary employees for a total of 201 (1.18%) employees with Targeted Disabilities. The federal-wide goal is 2.0%. This was a net decrease of 28 (12.50%) full/part time permanent employees and a net increase of 2 (66.67%) temporary employees for a net decrease of 26 (11.45%) employees compared to FY 2012.



<b>EEOC FORM 715-01 PART F</b>	<i>U.S. Equal Employment Opportunity Commission</i> <b>FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT</b>	
<b>U. S. Environmental Protection Agency</b>	<b>For period covering October 1, 2012 to September 30, 2013.</b>	

CERTIFICATION of ESTABLISHMENT of CONTINUING  
EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS

I, Helena Wooden-Aguilar, Acting Director of Civil Rights, am the Principal EEO Director/Official for the US Environmental Protection Agency.

EPA has conducted an annual self-assessment of Section 717 and Section 501 programs against the essential elements as prescribed by EEO MD-715. If an essential element was not fully compliant with the standards of EEO MD-715, a further evaluation was conducted and, as appropriate, EEO Plans for Attaining the Essential Elements of a Model EEO Program, are included with this Federal Agency Annual EEO Program Status Report.

EPA has also analyzed its workforce profiles and conducted barrier analyses aimed at detecting whether any management or personnel policy, procedure or practice is operating to disadvantage any group based on race, national origin, gender or disability. EEO Plans to Eliminate Identified Barriers, as appropriate, are included with this Federal Agency Annual EEO Program Status Report.

I certify that proper documentation of this assessment is in place and is being maintained for EEOC review upon request.

\_\_\_\_\_  
 Signature of Principal EEO Director/Official  
 Certifies that this Federal Agency Annual EEO Program  
 Status Report is in compliance with EEO MD-715.

\_\_\_\_\_  
 Date

\_\_\_\_\_  
 Signature of Agency Head or Agency Head Designee

\_\_\_\_\_  
 Date

**Part G: Agency Self-Assessment****Essential Element A: Demonstrated Commitment From Agency Leadership**

Requires EPA head to issue written policy statements ensuring a workplace free of discriminatory harassment and a commitment to equal employment opportunity.

EEOC MD 715 Agency Assessment Questions	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to EPA's Status Report
	Yes	No	
Compliance Indicator: EEO policy statements are up-to-date.			
1. EPA Head was installed on June 18, 2013. The EEO policy statement was issued September 7, 2012 by the previous Acting Administrator. Was the EEO Policy Statement issued within 6 - 9 months of the installation of EPA Head? If no, provide an explanation.	X		New Administrator issued policy statement in January 2014.
2. During the current Agency Head's tenure, has the EEO Policy Statement been reissued annually? If no, provide an explanation.	X		
3. Are new employees provided a copy of the EEO Policy Statement during orientation?	X		
4. When an employee is promoted into the supervisory ranks, is s/he provided a copy of the EEO Policy Statement?	X		
5. Have the heads of subordinate reporting components communicated support of all Agency EEO policies through the ranks?	X		
6. Has EPA made written materials available to all employees and applicants, informing them of the variety of EEO programs and administrative and judicial remedial procedures available to them?	X		
7. Has EPA prominently posted such written materials in all personnel offices, EEO offices, and on EPA's internal website? [see 29 CFR §1614.102(b)(5)]	X		
Compliance Indicator: Agency EEO policy is vigorously enforced by Agency management.			
8. Are managers and supervisors evaluated on their commitment to Agency EEO policies and principles, including their efforts to:	X		
9. resolve problems/disagreements and other conflicts in their respective work environments as they arise?	X		

10. address concerns, whether perceived or real, raised by employees and following-up with appropriate action to correct or eliminate tension in the workplace?	X		
11. support EPA's EEO Program through allocation of mission personnel to participate in community outreach and recruitment programs with private employers, public schools and universities?	X		
12. ensure full cooperation of employees under his/her supervision with EEO office officials such as EEO Counselors, EEO Investigators, etc.?	X		
13. ensure a workplace that is free from all forms of discrimination, harassment and retaliation?	X		
14. ensure that subordinate supervisors have effective managerial, communication and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications?	X		
15. ensure the provision of requested religious accommodations when such accommodations do not cause an undue hardship?	X		
16. ensure the provision of requested disability accommodations to qualified individuals with disabilities when such accommodations do not cause an undue hardship?	X		
17. Have all employees been informed about what behaviors are inappropriate in the workplace and that this behavior may result in disciplinary actions?	X		
18. Describe what means were utilized by EPA to so inform its workforce about the penalties for unacceptable behavior. This was listed in the Administrator's Policy Statement that was distributed to all employees. It was also included in a variety of EEO trainings conducted by EPA and is reiterated throughout Agency by EEO and HRO staff. It is also included in EPA's Table of Penalties, which is accessible to all employees through the intranet.	X		

19. Have the procedures for reasonable accommodation for individuals with disabilities been made readily available/accessible to all employees by disseminating such procedures during orientation of new employees and by making such procedures available on the World Wide Web or Internet?	X		
20. Have managers and supervisor been trained on their responsibilities under the procedures for reasonable accommodation?	X		

### Essential Element B: Integration of EEO into EPA's Strategic Mission

Requires that EPA's EEO programs be organized and structured to maintain a workplace that is free from discrimination in any of EPA's policies, procedures or practices and supports EPA's strategic mission.

EEOC MD 715 Agency Assessment Questions	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to EPA's status report.
	Yes	No	
Compliance Indicator: The reporting structure for the EEO Program provides the Principal EEO Official with appropriate authority and resources to effectively carry out a successful EEO Program.			
21. Is the EEO Director under the direct supervision of EPA head? [see 29 CFR §1614.102(b)(4)] For subordinate level reporting components, is the EEO Director/Officer under the immediate supervision of the lower level component's head official? (For example, does the Regional EEO Officer report to the Regional Administrator?)	X		
22. Are the duties and responsibilities of EEO officials clearly defined?	X		
23. Do the EEO officials have the knowledge, skills, and abilities to carry out the duties and responsibilities of their positions?	X		
24. If EPA has 2 <sup>nd</sup> level reporting components, are there organizational charts that clearly define the reporting structure for EEO programs?	N/A		
25. If EPA has 2 <sup>nd</sup> level reporting components, does EPA-wide EEO Director have authority for the EEO programs within the subordinate reporting components?	N/A		
If not, please describe how EEO program authority is delegated to subordinate reporting components.			



Compliance Indicator: The EEO Director and other EEO professional staff responsible for EEO programs have regular and effective means of informing EPA head and senior management officials of the status of EEO programs and are involved in, and consulted on, management/personnel actions.			
26. Does the EEO Director/Officer have a regular and effective means of informing EPA head and other top management officials of the effectiveness, efficiency and legal compliance of EPA's EEO program?	X		
27. Following the submission of the immediately preceding FORM 715-01, did the EEO Director/Officer present to the head of EPA and other senior officials the "State of EPA" briefing covering all components of the EEO report, including an assessment of the performance of EPA in each of the six elements of the Model EEO Program and a report on the progress of EPA in completing its barrier analysis including any barriers it identified and/or eliminated or reduced the impact of?	X		
28. Are EEO program officials present during agency deliberations prior to decisions regarding recruitment strategies, vacancy projections, succession planning, selections for training/career development opportunities, and other workforce changes?	X		
29. Does EPA consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions such as re-organizations and re-alignments?	X		
30. Are management/personnel policies, procedures and practices examined at regular intervals to assess whether there are hidden impediments to the realization of equality of opportunity for any group(s) of employees or applicants? [see 29 C.F.R. § 1614.102(b)(3)]	X		

31. Is the EEO Director included in EPA's strategic planning, especially EPA's human capital plan, regarding succession planning, training, etc., to ensure that EEO concerns are integrated into EPA's strategic mission?	X		
Compliance Indicator: EPA has committed sufficient human resources and budget allocations to its EEO programs to ensure successful operation.			
32. Does the EEO Director have the authority and funding to ensure implementation of agency EEO Action Plans to improve EEO program efficiency and/or eliminate identified barriers to the realization of equality of opportunity?	X		
33. Are sufficient personnel resources allocated to the EEO Program to ensure that agency self-assessments and self-analyses prescribed by EEO MD-715 are conducted annually and to maintain an effective complaint processing system?	X		
34. Are statutory/regulatory EEO related Special Emphasis Programs sufficiently staffed?	X		
35. Federal Women's Program - 5 U.S.C. 7201; 38 U.S.C. 4214; Title 5 CFR, Subpart B, 720.204	X		
36. Hispanic Employment Program - Title 5 CFR, Subpart B, 720.204	X		
37. People With Disabilities Program Manager; Selective Placement Program for Individuals With Disabilities - Section 501 of the Rehabilitation Act; Title 5 U.S.C. Subpart B, Chapter 31, Subchapter I-3102; 5 CFR 213.3102(t) and (u); 5 CFR 315.709	X		
38. Are other agency special emphasis programs monitored by the EEO Office for coordination and compliance with EEO guidelines and principles, such as FEORP - 5 CFR 720; Veterans Employment Programs; and Black/African American; American Indian/Alaska Native, Asian American/Pacific Islander programs?	X		

Compliance Indicator: EPA has committed sufficient budget to support the success of its EEO Programs.			
39. Are there sufficient resources to enable EPA to conduct a thorough barrier analysis of its workforce, including the provision of adequate data collection and tracking systems	X		
40. Is there sufficient budget allocated to all employees to utilize, when desired, all EEO programs, including the complaint processing program and ADR, and to make a request for reasonable accommodation? (Including subordinate level reporting components?)	X		
41. Has funding been secured for publication and distribution of EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures, etc.)?	X		
42. Is there a central fund or other mechanism for funding supplies, equipment and services necessary to provide disability accommodations?	X		
43. Does EPA fund major renovation projects to ensure timely compliance with Uniform Federal Accessibility Standards?	X		
44. Is the EEO Program allocated sufficient resources to train all employees on EEO Programs, including administrative and judicial remedial procedures available to employees?	X		
45. Is there sufficient funding to ensure the prominent posting of written materials in all personnel and EEO offices? [see 29 C.F.R. § 1614.102(b)(5)]	X		
46. Is there sufficient funding to ensure that all employees have access to this training and information?	X		
47. Is there sufficient funding to provide all managers and supervisors with training and periodic up-dates on their EEO responsibilities:	X		

48. for ensuring a workplace that is free from all forms of discrimination, including harassment and retaliation?	X		
49. to provide religious accommodations?	X		
50. to provide disability accommodations in accordance with EPA's written procedures?	X		
51. in the EEO discrimination complaint process?	X		
52. to participate in ADR?	X		

### Essential Element C: Management and Program Accountability

This element requires EPA Head to hold all managers, supervisors, and EEO Officials responsible for the effective implementation of EPA's EEO Program and Plan.

EEOC MD 715 Agency Assessment Questions	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to EPA's status report
	Yes	No	
Compliance Indicator: EEO program officials advise and provide appropriate assistance to managers/supervisors about the status of EEO programs within each manager's or supervisor's area or responsibility.			
53. Are regular (monthly/quarterly/semi-annually) EEO updates provided to management/supervisory officials by EEO program officials?	X		
54. Do EEO program officials coordinate the development and implementation of EEO Plans with all appropriate agency managers to include Agency Counsel, Human Resource Officials, Finance, and the Chief information Officer?	X		
Compliance Indicator: The Human Resources Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures are in conformity with instructions contained in EEOC management directives. [see 29 CFR § 1614.102(b)(3)]			
55. Have time-tables or schedules been established for EPA to review its Merit Promotion Program Policy and Procedures for systemic barriers that may be impeding full participation in promotion opportunities by all groups?	X		
56. Have time-tables or schedules been established for EPA to review its Employee Recognition Awards Program and Procedures for systemic barriers that may be impeding full participation in the program by all groups?	X		



57. Have time-tables or schedules been established for EPA to review its Employee Development/Training Programs for systemic barriers that may be impeding full participation in training opportunities by all groups?	X		
Compliance Indicator: When findings of discrimination are made, EPA explores whether or not disciplinary actions should be taken.			
58. Does EPA have a disciplinary policy and/or a table of penalties that covers employees found to have committed discrimination?	X		
59. Have all employees, supervisors, and managers been informed as to the penalties for being found to perpetrate discriminatory behavior or for taking personnel actions based upon a prohibited basis?	X		
60. Has EPA, when appropriate, disciplined or sanctioned managers/supervisors or employees found to have discriminated over the past two years?	X		Please see response below.
<p>If so, cite number found to have discriminated and list penalty/disciplinary action for each type of violation.</p> <p>Response: There was one finding of discrimination during this time period, and as of the date of this report, management is considering appropriate disciplinary action in accordance with EPA's Table of Penalties; however, no final decision have yet been made.</p>			
61. Does EPA promptly (within the established time frame) comply with EEOC, Merit Systems Protection Board, Federal Labor Relations Authority, labor arbitrators, and District Court orders?	X		
62. Does EPA review disability accommodation decisions/actions to ensure compliance with its written procedures and analyze the information tracked for trends, problems, etc.?	X		

**Essential Element D: Proactive Prevention**

Requires that EPA head makes early efforts to prevent discriminatory actions and eliminate barriers to equal employment opportunity in the workplace.

EEOC MD 715 Agency Assessment Questions	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to EPA's status report
	Yes	No	
Compliance Indicator: Analyses to identify and remove unnecessary barriers to employment are conducted throughout the year.			
63. Do senior managers meet with and assist the EEO Director and/or other EEO Program Officials in the identification of barriers that may be impeding the realization of equal employment opportunity?	X		
64. When barriers are identified, do senior managers develop and implement, with the assistance of EPA EEO office, agency EEO Action Plans to eliminate said barriers?	X		
65. Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans?	X		
66. Are trend analyses of workforce profiles conducted by race, national origin, sex and disability?	X		
67. Are trend analyses of the workforce's major occupations conducted by race, national origin, sex and disability?	X		
68. Are trends analyses of the workforce's grade level distribution conducted by race, national origin, sex and disability?	X		
69. Are trend analyses of the workforce's compensation and reward system conducted by race, national origin, sex and disability?	X		

70. Are trend analyses of the effects of management/personnel policies, procedures and practices conducted by race, national origin, sex and disability?	X		
Compliance Indicator: The use of Alternative Dispute Resolution (ADR) is encouraged by senior management.			
71. Are all employees encouraged to use ADR?	X		
72. Is the participation of supervisors and managers in the ADR process required?	X		

Essential Element E: Efficiency

Requires that EPA head ensure that there are effective systems in place for evaluating the impact and effectiveness of EPA's EEO Programs as well as an efficient and fair dispute resolution process.

EEOC MD 715 Agency Assessment Questions	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to EPA's status report
	Yes	No	
Compliance Indicator: EPA has sufficient staffing, funding, and authority to achieve the elimination of identified barriers.			
73. Does the EEO Office employ personnel with adequate training and experience to conduct the analyses required by MD-715 and these instructions?		X	Please see H-1.
74. Has EPA implemented an adequate data collection and analysis systems that permit tracking of the information required by MD-715 and these instructions?	X		
75. Have sufficient resources been provided to conduct effective audits of field facilities' efforts to achieve a model EEO program and eliminate discrimination under Title VII and the Rehabilitation Act?	X		
76. Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations in all major components of EPA?	X		
77. Are 90% of accommodation requests processed within the time frame set forth in EPA procedures for reasonable accommodation?	X		
Compliance Indicator: EPA has an effective complaint tracking and monitoring system in place to increase the effectiveness of EPA's EEO Programs.			

78. Does EPA use a complaint tracking and monitoring system that allows identification of the location and status of complaints and length of time elapsed at each stage of EPA's complaint resolution process?	X		
79. Does EPA's tracking system identify the issues and bases of the complaints, the aggrieved individuals/complainants, the involved management officials and other information to analyze complaint activity and trends?	X		
80. Does EPA hold contractors accountable for delay in counseling and investigation processing times?	X		
If yes, briefly describe how: In the event of a delay, contract payment is reduced or the contract is not renewed.			
81. Does EPA monitor and ensure that new investigators, counselors, including contract and collateral duty investigators, receive the 32 hours of training required in accordance with EEO Management Directive MD-110?	X		
82. Does EPA monitor and ensure that experienced counselors, investigators, including contract and collateral duty investigators, receive the 8 hours of refresher training required on an annual basis in accordance with EEO Management Directive MD-110?	X		
Compliance Indicator: EPA has sufficient staffing, funding and authority to comply with the time frames in accordance with the EEOC (29 C.F.R. Part 1614) regulations for processing EEO complaints of employment discrimination.			
83. Are benchmarks in place that compares EPA's discrimination complaint processes with 29 C.F.R. Part 1614?	X		
84. Does EPA provide timely EEO counseling within 30 days of the initial request or within an agreed upon extension in writing, up to 60 days?	X		



85. Does EPA provide an aggrieved person with written notification of his/her rights and responsibilities in the EEO process in a timely fashion?	X		
86. Does EPA complete the investigations within the applicable prescribed time frame?		X	Please see H-2.
87. When a complainant requests a final agency decision, does EPA issue the decision within 60 days of the request?		X	Please see H-2.
88. When a complainant requests a hearing, does EPA immediately upon receipt of the request from the EEOC AJ forward the investigative file to the EEOC Hearing Office?	X		
89. When a settlement agreement is entered into, does EPA timely complete any obligations provided for in such agreements?	X		
90. Does EPA ensure timely compliance with EEOC AJ decisions which are not the subject of an appeal by EPA?	X		
Compliance Indicator: There is an efficient and fair dispute resolution process and effective systems for evaluating the impact and effectiveness of EPA's EEO complaint processing program.			
91. In accordance with 29 C.F.R. §1614.102(b), has EPA established an ADR Program during the pre-complaint and formal complaint stages of the EEO process?	X		
92. Does EPA require all managers and supervisors to receive ADR training in accordance with EEOC (29 C.F.R. Part 1614) regulations, with emphasis on the federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR?	X		
93. After EPA has offered ADR and the complainant has elected to participate in ADR, are the managers required to participate?	X		

94. Does the responsible management official directly involved in the dispute have settlement authority?	X		
Compliance Indicator: EPA has effective systems in place for maintaining and evaluating the impact and effectiveness of its EEO programs.			
95. Does EPA have a system of management controls in place to ensure the timely, accurate, complete and consistent reporting of EEO complaint data to the EEOC?	X		Please see H-2.
96. Does EPA provide reasonable resources for the EEO complaint process to ensure efficient and successful operation in accordance with 29 C.F.R. § 1614.102(a)(1)?	X		
97. Does EPA EEO office have management controls in place to monitor and ensure that the data received from Human Resources is accurate, timely received, and contains all the required data elements for submitting annual reports to the EEOC?	X		
98. Do EPA's EEO programs address all of the laws enforced by the EEOC?	X		
99. Does EPA identify and monitor significant trends in complaint processing to determine whether EPA is meeting its obligations under Title VII and the Rehabilitation Act?	X		
100. Does EPA track recruitment efforts and analyze efforts to identify potential barriers in accordance with MD-715 standards?		X	Please see H-3.
101. Does EPA consult with other agencies of similar size on the effectiveness of their EEO programs to identify best practices and share ideas?	X		
Compliance Indicator: EPA ensures that the investigation and adjudication function of its complaint resolution process are separate from its legal defense arm of agency or other offices with conflicting or competing interests.			

102. Are legal sufficiency reviews of EEO matters handled by a functional unit that is separate and apart from the unit which handles agency representation in EEO complaints?	X		
103. Does EPA discrimination complaint process ensure a neutral adjudication function?	X		
104. If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints? Yes	X		Please see H-2.

**Essential Element F: Responsiveness and Legal Compliance**

This element requires that federal agencies are in full compliance with EEO statutes and EEOC regulations, policy guidance, and other written instructions.

EEOC MD 715 Agency Assessment Questions	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to EPA's status report
	Yes	No	
Compliance Indicator: Agency personnel are accountable for timely compliance with orders issued by EEOC Administrative Judges.			
105. Does EPA have a system of management control to ensure that agency officials timely comply with any orders or directives issued by EEOC Administrative Judges?	X		
Compliance Indicator: EPA's system of management controls ensures that EPA timely completes all ordered corrective action and submits its compliance report to EEOC within 30 days of such completion.			
106. Does EPA have control over the payroll processing function of EPA? If Yes, answer the two questions below.	X		
107. Are there steps in place to guarantee responsive, timely, and predictable processing of ordered monetary relief?	X		
108. Are procedures in place to promptly process other forms of ordered relief?	X		
Compliance Indicator: Agency personnel are accountable for the timely completion of actions required to comply with orders of EEOC.			
109. Is compliance with EEOC orders encompassed in the performance standards of any agency employees?	X		

If so, please identify the employees by title in the comments section, and state how performance is measured. Compliance is specifically included in performance standards of the Assistant Director of the Employment Complaints Resolutions Division. The position is currently vacant due to the retirement of the previous Assistant Director. The vacancy has been announced and a selection is expected shortly.

110. Is the unit charged with the responsibility for compliance with EEOC orders located in the EEO office?

X

If not, please identify the unit in which it is located, the number of employees in the unit, and their grade levels in the comments section. N/A

111. Have the involved employees received any formal training in EEO compliance?

X

Does EPA promptly provide to the EEOC the following documentation for completing compliance:

112. Attorney Fees: Copy of check issued for attorney fees and /or a narrative statement by an appropriate agency official, or agency payment order dating the dollar amount of attorney fees paid?

X

113. Awards: A narrative statement by an appropriate agency official stating the dollar amount and the criteria used to calculate the award?

X

114. Back Pay and Interest: Computer print-outs or payroll documents outlining gross back pay and interest, copy of any checks issued, narrative statement by an appropriate agency official of total monies paid?

X

115. Compensatory Damages: The final agency decision and evidence of payment, if made?

X

116. Training: Attendance roster at training session(s) or a narrative statement by an appropriate agency official confirming that specific persons or groups of persons attended training on a date certain?

X

117. Personnel Actions (e.g., Reinstatement, Promotion, Hiring, Reassignment): Copies of SF-50s	X		
118. Posting of Notice of Violation: Original signed and dated notice reflecting the dates that the notice was posted. A copy of the notice will suffice if the original is not available.	X		
119. Supplemental Investigation: 1. Copy of letter to complainant acknowledging receipt from EEOC of remanded case. 2. Copy of letter to complainant transmitting the Report of Investigation (not the ROI itself unless specified). 3. Copy of request for a hearing (complainant's request or agency's transmittal letter).	X		
120. Final Agency Decision (FAD): FAD or copy of the complainant's request for a hearing.	X		
121. Restoration of Leave: Print-out or statement identifying the amount of leave restored, if applicable. If not, an explanation or statement.	X		
122. Civil Actions: A complete copy of the civil action complaint demonstrating same issues raised as in compliance matter.	X		
123. Settlement Agreements: Signed and dated agreement with specific dollar amounts, if applicable. Also, appropriate documentation of relief is provided.	X		

Part H Plan to Correct Deficiencies

**Part H-1: EEO Staff and MD 715**

STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:	(Part G: Q-73) Does the EEO Office employ personnel with adequate training and experience to conduct the analyses required by MD 715 and these instructions? No.	
OBJECTIVE:	To further improve the training and skills of EEO personnel in the Office of Civil Rights and in the Regions to enable them to administer all aspects of the EEO process.	
RESPONSIBLE OFFICIAL:	Director, Office of Civil Rights	
DATE OBJECTIVE INITIATED:	September 1, 2010	
TARGET DATE FOR COMPLETION OF OBJECTIVE:	December 12, 2013	
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)	
EPA hired outside expert/consultant to review structure, management and staff and to make recommendations concerning EEO Office in order to help EPA establish a model EEO program.	<b>Completed March 2011</b>	
Within thirty days of receiving the consultant's recommendations, EPA will develop and implement an Action Plan, which will include identifying managerial challenges; strengthening employees' skills; and creating adequate oversight measures for timely completion of the MD 715 report and other EEO functions.	<b>Completed April 2011</b>	



Establish Executive Committee to develop strategy to continue to strengthen Agency's EEO and Civil Rights Program.	<b>Completed August 2011</b>
Share information with all Office of Civil Rights staff about the availability of resources to help each of them create an Individual Development Plan (IDP), containing individual goals consistent with organizational goals.	<b>Completed November 2011</b>
Re-evaluate and revise the performance standard for OCR, Affirmative Employment Analysis and Accountability staff to clarify the expectations and functions.	<b>Completed October 2012</b>
Hire new program analyst staff in the Office of Civil Rights, OCR, Affirmative Employment Analysis and Accountability Division subject to budgetary constraints, who will be primarily responsible for MD 715-related statistical analysis.	<b>Completed July 2013</b>
Based on the recommendations of Executive Committee, implement the proposed organizational realignment with the Office of Diversity, Advisory Committee Management and Outreach.	<b>Completed July 2013</b>
Monitor progress of staff training and development related to affirmative employment programs and MD 715.	<b>Completed September 2013</b>
Conduct MD 715 Barrier Analysis Training for Affirmative Employment Analysis and Accountability division and MD-715 stakeholders.	<b>Completed December 2013</b>
<b>REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE:</b>	
<p>Although EPA has submitted MD 715 Reports in accordance with regulatory deadlines every year since 2010, the Office of Civil Rights continues to realign the mission and enhance the capacity of its staff in the Affirmative Employment Analysis and Accountability division (AEAA). In Fiscal Year (FY) 2011, AEAA was identified as having substantial deficiencies by an Agency-commissioned report from a management consulting firm. The report described one of the Office of Civil Right's challenges as being related to deficiencies in the qualifications, knowledge, and training of some staff in the Office of Civil Rights. The Civil Rights Executive Committee, led by EPA's Deputy Administrator, developed an implementation strategy to help address the deficiencies identified.</p>	

In FY 2012, EPA began the implementation of that strategy, perhaps most notably by initiating the reorganization of the functions of AEAA and the Office of Diversity, Advisory Committee Management and Outreach (ODACMO). In particular, Special Emphasis observance functions regarding outreach and Heritage Month were transitioned under the leadership and management of ODACMO in July 2013. At this time, the Affirmative Employment division was renamed AEAA and the staff began to focus primarily on the development and implementation of Management Directive 715 Programs. These responsibilities were added to the Performance Appraisal and Recognition System (PARS) of AEAA staff members. EPA believes that this transition will result in continued improvements in its MD 715 Program. The new focus of AEAA staff is on: 1) barrier analysis through the careful examination of Agency policies, practices, and procedures; 2) working with senior leaders and managers, including the Office of Human Resources (OHR), and ODACMO, in developing Action Plans to address and correct any identified deficiencies or barriers to EEO; and 3) monitoring the implementation of action plans, as well as writing and submitting the MD 715 Report in a timely manner.

EPA is pleased that every Region and AAship have their own MD 715 Action Plan with specific goals and accomplishments, which support the FY 2012 MD 715 report and are included as an attachment to this report and demonstrate the scope and impact of EPA's affirmative programs of EEO. Although Region and AAship Action Plans have been included in EPA's MD 715 Reports since 2011, the AEAA staff conducted Technical Assistance Visits, for the first time in 2013, to provide feedback and identify linkages between Action Plan commitments and EPA's overall MD 715 goals.

In FY 2013, the Office of Civil Rights prioritized training and improving the capacity of AEAA staff to complete the analysis required by MD 715. Since July 2013, an attorney advisor in the Civil Rights and Finance Law Office has provided on-the-job training to the AEAA staff on a one-on-one basis, which included tasks designed to help build the staff's capacity, such as discussing and implementing a project management strategy for completion of the MD 715; analyzing third quarter applicant flow data; gathering facts about the status of planned items, etc. In August 2013, the AEAA staff attended the EEOC's Basics of MD 715 training. In addition, the Defense Equal Opportunity Management Institute (DEOMI) presented barrier analysis training to the AEAA staff from December 9 to December 12, 2013.

Despite these successes, AEAA experienced a gap in managerial leadership when its former Assistant Director retired in March 2013. Nonetheless, EPA is happy to report that an Acting AEAA Director was appointed on December 2, 2013, and EPA has selected a permanent AEAA Assistant Director. EPA continues to identify AEAA as an area that should be closely monitored to ensure sufficient progress and improvement as the Agency continues to develop a Model EEO Program.

## Part H-2: Timeliness and Effectiveness of EEO Complaints Processing Program

STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:	<p>(Part G: Q-86) Does EPA complete the investigations within the applicable prescribed time frame? No.</p> <p>(Part G: Q-87) When a complainant requests a final Agency decision, does EPA issue the decision within 60 days of the request? No.</p> <p>(Part G: Q-104) If applicable, are processing timeframes incorporated for the legal counsel's sufficiency review for timely processing of complaints? Yes.</p>	
OBJECTIVE:	<p>To ensure that EEO investigations and final Agency decisions are consistently completed within the timeframes proscribed by EEOC MD 110 and 29 C.F.R. Part 1614.</p> <p>To ensure that legal counsel is given adequate time to conduct sufficiency reviews while still meeting regulatory timeframes.</p>	
RESPONSIBLE OFFICIAL:	<p>Director, Office of Civil Rights Assistant Director, Employment Complaints Resolutions Division Deputy Regional Administrators</p>	
DATE OBJECTIVE INITIATED:	March 1, 2011	
TARGET DATE FOR COMPLETION OF OBJECTIVE:	September 30, 2014	
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:		TARGET DATE (Must be specific)
The Office of Civil Rights will develop effective performance terms with its contract investigators to ensure timely completion of investigations.		<b>Completed April 2011</b>

The Office of Civil Rights will develop and implement a plan consistent with federal procurement policies to terminate contracts for failure to comply with established timeframes.	<b>Completed September 2011</b>
The Office of Civil Rights will develop and implement a new complaint status report tracking system, which tracks all complaint-related events and will share the reports within the EEO community.	<b>Completed September 2011</b>
The Office of Civil Rights will work with a new contractor (United States Postal Service) to handle EEO complaint investigations.	<b>Completed October 2011</b>
The Office of Civil Rights will enhance EEO Officer and counselor training on meeting deadlines.	<b>Completed February 2012</b>
The Office of Civil Rights will evaluate the effectiveness of the new iComplaints system.	<b>Completed September 2012</b>
The Office of Civil Rights will conduct analysis of the ADR program including ways to improve utilization.	<b>Completed June 30, 2013</b>
The Office of Civil Rights will develop Standard Operating Procedures, case tracking processes, guidance on updating Regional offices concerning complaint-specific events, and specific timeframes that will enable EPA to meet complaint-related deadlines.	<b>Completed June 30, 2013</b>
The Director of the Office of Civil Rights and the Assistant Director, Employment Complaints Resolutions Division will evaluate these new practices and periodically conduct a quality assurance review of complaint process procedures and processes.	<b>Completed September 30, 2013</b>
The Office of Civil Rights will evaluate United States Postal Service and make modifications if needed.	<b>Completed September 1, 2013</b>
The Office of Civil Rights will generate reports (No FEAR, 462 Reports) to develop briefings for EEO Officers and Agency management.	May 1, 2014

<p>The Office of Civil Rights will evaluate the effectiveness of its newly developed Statements of Work with United States Postal Service (USPS), the contractor responsible for conducting investigations into complaints of discrimination.</p>	<p>September 1, 2014</p>
<p>The Office of Civil Rights will evaluate the effectiveness of the complaint-related timeframes it has incorporated into its Standard Operating Procedures.</p>	<p>September 1, 2014</p>
<p>REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE:</p>	
<p>(Q-86) At the end of FY 2013, EPA's Office of Civil Rights (OCR) experienced a 46% decrease in the completion time for procedural dismissals and a reduction in time for the completion of investigations regarding newly filed cases from 194 days in FY 2012 to 180 days in FY 2013. OCR also eliminated its backlog of long-overdue cases and now, only has cases pending in investigation that were filed in 2012 or later. In September 2013, the Employment Complaint Resolutions Staff (ECRS) attended two days of in-depth training regarding best practices for researching and writing letters of acceptance/dismissal. By virtue of this training, ECRS staff members enhanced their subject matter expertise, enabling them to work more efficiently in preparing letters of acceptance/dismissal and processing complaints in a timely fashion.</p> <p>With respect to investigations, the Interagency Agreement between EPA and USPS, signed September 2011, has enhanced OCR's ability to complete investigations within the established timeframes and improved the quality of investigations. USPS has an excellent track record with respect to the timely processing of investigations. OCR has been working with USPS on an ongoing basis to refine the investigations process, and finalized the Statements of Work with USPS on September 1, 2013.</p> <p>In addition, OCR has made full use of the complaints tracking system, iComplaints, procured during FY 2012. In FY 2013, ECRS staff succeeded in converting all active cases to the system. This new system from the Micropact Corporation provides easy complaint tracking and monitoring systems concerning the identification, location, and status of a complaint throughout the lifecycle of the EEO complaint process. The ECRS staff received extensive training on iComplaints. In addition, OCR worked with Regional EEO Officers to deploy iComplaints, which allows for better tracking of complaints at the regional level. The use of iComplaints has also assisted in improving investigation completion time as it provides readily available information about each case and complainant.</p> <p>After completing its planned activity of enhancing EEO Officer and Counselor training on meeting deadlines, OCR determined that additional efforts in this area would benefit its program. In April 2013, OCR overhauled its EEO Counselor training program to provide</p>	

Counselors with an extensive training each month that included EEO case updates from in-house attorneys, mock counseling experiences, and mentorship. In FY 2013, OCR also trained and certified eleven new Counselors. These efforts have led to a 92% reduction in untimely counseling in FY 2013. In addition, they have helped to improve efficiency of the formal complaint process by ensuring that ECRS staff utilizes their time primarily on analysis rather than additional fact gathering.

(Q-87) During FY 2013, OCR continued to eliminate a backlog of final agency decisions (FADs). While in FY 2012 OCR had pending FADs that dated back to 2008, at the end of FY 2013, OCR's oldest FAD was from 2010. Moreover, OCR reduced its issuance time for FADs by 61% between FY 2012 and FY 2013. The aforementioned Interagency Agreement between EPA and USPS, the hiring of two in-house attorneys for OCR over the last two fiscal years, and the use of Agency attorneys on details has enhanced OCR's ability to complete FADs in a timely manner. The ECRS staff also received a comprehensive five-day training on the preparation of FADs and review of Reports of Investigation.

(Q-104) EPA is committed to improving EEO complaint processing, and believes that it is continuing to make substantial progress towards achieving this goal in FY 2013. As noted, in 2012 OCR drafted a comprehensive Standard Operating Procedure outlining complaint procedures. The tools and resources described have helped and should continue to help in incorporating sufficient time for legal reviews by increasing the likelihood that cases submitted to the Office of General Counsel, Civil Rights and Finance Law Office for legal review are thoroughly investigated, and the FADs are well-written as well as provided sufficiently in advance of the expiration of the regulatory 60-day time requirement.

## Part H-3: Tracking and Analysis of Recruitment Efforts

STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:	(Part G: Q-100) Does EPA track recruitment efforts and analyze efforts to identify potential barriers in accordance with MD 715 standards?	
OBJECTIVE:	To create a mechanism for proactive information and communications exchanged among EPA's national recruitment program staff, selecting officials, organizational program management/regional human resources staff, and leadership in the Human Resources Shared Service Centers to shape recruitment efforts in their early stages and help reduce barriers. The desired goal is to focus recruitment efforts to enhance diversity in the applicant pools.	
RESPONSIBLE OFFICIAL:	Assistant Administrator, Office of Administration & Resources Management Associate Assistant Administrator, Office of Diversity, Advisory Committee Management and Outreach Director, Office of Human Resources Director, Office of Civil Rights	
DATE OBJECTIVE INITIATED:	November 1, 2011	
TARGET DATE FOR COMPLETION OF OBJECTIVE:	September 30, 2016	
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:		TARGET DATE (Must be specific)
Draft guidebook on hiring flexibilities and authorities for managers and organizations, covering key approaches to recruitment and selection, particularly through hiring authorities under Schedule A.		<b>Completed May 2011</b>

Develop “road show” presentation package to support managers’ guidebook and in-person presentations by representatives of the recruitment staff on hiring flexibilities and approaches to managers.	<b>Completed January 2012</b>
Collaborate with program management officers and regional human resources officers on content and messaging of guidebook and “road show.”	<b>Completed January 2012</b>
Finalize guidebook and launch “road show.”	<b>Completed February 2012</b>
The Director of Human Resources will evaluate these new practices and make any necessary changes or modifications.	<b>Completed May 2012</b>
The Office of Civil Rights will conduct a quarterly review of ongoing MD 715 programs to strengthen Agency Accountability. (OCR)	<b>Completed July 2012</b>
The Office of Human Resources and Office of Diversity Advisory Committee Management Office will collect and analyze the race/national origin and sex data of participants in FY 12 and first three quarters of FY 13 Successful Leader Program.	<b>Completed July 2013</b>
The Office of Human Resources will develop a process for collecting internal Senior Executive Service applicant flow data.	March 2014
The Office of Human Resources will update the guidebook on hiring flexibilities and authorities and ensure that the updated information is broadly distributed to EPA selecting officials.	March 2014
The Office of Human Resources will finalize the supervisory guidebook on selections and hiring authorities and launch in-person presentations throughout EPA Regions and AAships.	March 2014
The Office of Civil Rights will finalize a survey to collect data related to the use and composition of hiring/interview panels from the last quarter of FY 12 to the first three quarters of FY 13.	March 2014
The Office of Human Resources will update the exit interview form and process to track the motivation for employees’ departure from Agency employment.	March 2014
The Office of Human Resources will launch a Learning Management System to track Agency employees’ participation in career development activities, including trainings, details, and e-learning to determine whether participation in such programs impacts the	September 2014



probability that individuals will apply for and qualify for senior grade positions.	
The Office of Human Resources will collect internal Senior Executive Service applicant flow data.	September 2014
The Office of Human Resources will evaluate the effectiveness of its strategic recruitment plan and guidance.	September 2015
The Office of Human Resources will circulate a report highlighting the career development data collected in the Learning Management System.	September 2015
<b>REPORT OF ACCOMPLISHMENTS AND MODIFICATIONS TO OBJECTIVE:</b>	
<p>Since 2011, EPA has collected applicant flow data for new hires and internal promotions in five major occupations, and the senior grades. However, FY 2013 is the first year that EPA has collected external Senior Executive Service applicant flow data. Moreover, in July 2013, the Office of Human Resources (OHR) collaborated with the Office of Diversity, Advisory Committee Management, and Outreach (ODACMO) to collect race/national origin and sex data of participants in the Successful leaders Program during FY 2012 and the first three quarters of FY2013. ODACMO will use the data to analyze the participation rates of race/national origin and sex groups, and determine what motivates participation in EPA's Successful Leader Program.</p> <p>EPA will soon implement several modifications to this objective to address the triggers highlighted in its workforce data and in furtherance of EPA's effort to identify any potential barriers to equal employment opportunity. These modifications include the following actions which EPA will take by the end of the fourth quarter of FY 14: 1) a process for collecting internal Senior Executive Service applicant flow data will be developed; 2) the guidebook on hiring flexibilities and authorities will be updated and broadly distributed to EPA selecting officials; and 3) the supervisory guidebook on selections and hiring authorities will be finalized and in-person presentations throughout EPA Regions and AAs will be launched.</p> <p>By the end of FY 14, EPA is pleased to report that: 1) a Learning Management System will be developed to track employees' participation in career development, including trainings, details, and e-learning; 2) internal Senior Executive Service applicant flow data will be collected for analysis in the FY 14 MD-715 Report; 3) the effectiveness of EPA's strategic recruitment plan and guidance will be evaluated; and 4) the exit interview form and process will be updated to collect data concerning employees' departure from Agency employment.</p>	

## Part I-1: New Hires

STATEMENT OF  
CONDITION THAT WAS  
A TRIGGER FOR A  
POTENTIAL BARRIER:

Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?

Data comparisons between the Relevant Civilian Labor Force (RCLF), application, qualification, and selection rates in some major occupations revealed instances of lower than expected application, qualification, and/or selection rates.

BARRIER ANALYSIS:  
Provide a description of the  
steps taken and data  
analyzed to determine  
cause of the condition.

EPA reviewed the statistical data associated with new hires (Table A7) for employees in six of its largest occupational categories. In addition, EPA reviewed its applicant flow data and analyses from 2011 and 2012. Although the exhaustive list of triggers is provided in each personnel transaction section, certain triggers were highlighted for illustrative purposes but not because they were more important or worse than other triggers.

The seven largest occupations include 0028 Environmental Protection Specialist, 0301 Miscellaneous Administration and Program Specialist, 0343 Management/Program Analyst, 0401 General Biological Science (Research), 0819 Environmental Engineer (Research), 0905 General Attorney, and 1301 Physical/Environmental Scientist (Research). Although General Attorneys in Series 0905 constitute one of EPA's major occupations, data could not be gathered for this job series because of the unique characteristics that apply to the selection process associated with excepted service positions. As mentioned in the planned activities noted below, EPA plans to develop a process to collect data for 0905 General Attorneys in 2014.

**Application**

In comparing the RCLF to the application rate, it appears that EPA experienced a level of success in its recruitment efforts. For instance, Black Males and Females, and Two or more Race Males and Females, for a second year, applied for positions at rates well above their representation in the RCLF in every major occupation series. In FY 2013, Hispanic Males also applied for

positions at rates above their representation in the RCLF in all occupations.

The triggers associated with the application rates of Native Hawaiian Males appear to have improved in FY 2013, when they applied for positions at rates at or higher than their representation in the RCLF in all major job occupations as compared to FY 2012, where triggers were noted in 2 major job occupations, 0301 Miscellaneous Administration and Program Specialist and 0819 Environmental Engineer.

On the other hand, Hispanic Females, for the second consecutive year, applied for positions at rates below their representation in the RCLF in the 0301 Miscellaneous Administration and Program Specialist occupational series, although they applied at or above their representation in the RCLF for all other major occupations in FY 2013.

The triggers in the application rate of White Females appear to have increased since 2011. In FY 2011 and 2012, triggers were noted in the application rate of White Females in 3 major occupational series: 0301 Miscellaneous Administration and Program Specialist, 0343 Management/Program Analyst, and 0401 General Biological Science. However, in FY 2013, White Females applied for positions at rates lower than their representation in the RCLF in 5 major occupational series.

For more detailed information about the specific race/national origin and sex groups that applied for major occupation positions at rates lower than their representation in the RCLF, please see the following chart:

<b>Race, National Origin and Sex</b>	<b>Occupational Series</b>
Hispanic Females	0301
White Males	0028, 0343, 0401, 0819
White Females	0028, 0301, 0343, 0401, 1301
Asian Males	0301, 0343, 1301
Asian Females	0301, 0343, 0401, 1301
Native Hawaiian Females	0819
American Indian Males	0343, 0401, 1301
American Indian Females	0343

In light of this data, EPA will continue to examine whether barriers to equal employment opportunity exist. In particular, EPA will try to determine whether an Agency policy, practice

or procedure is causing certain race/national origin and sex groups to apply for major occupation positions at rates that are less than anticipated. EPA has planned a number of activities to address the aforementioned triggers, which are referenced below and include: updating the hiring flexibilities and authorities guidebook; and evaluating the effectiveness of its strategic recruitment plan. After these planned activities are completed, EPA will evaluate whether they have impacted the triggers noted above.

### **Qualification**

EPA looked at the qualification rate for major occupations by comparing it to the application rate of the respective population. EPA appears to have experienced a few small successes with qualification rates. For example, in FY 2013, the qualification rates of Hispanic, White, and Asian Males was lower than their application rate in less major occupations than in FY 2012. Also, Asian Males went from having triggers noted in their qualification rate in four major occupational series in FY 2012 to having a trigger noted in one major occupational series in FY 2013.

The qualification rates of White, Asian, and Native Hawaiian Females were higher than their application rates in all major occupational series except 0819 Environmental Engineer and 1301 Physical/Environmental Scientist respectively. White and Asian Females qualification rates were higher than their application rates in all major occupational series in FY 2012. Similarly, in the 1301 Physical/Environmental Scientist series, Native Hawaiian Females qualification rates were higher than their application rates in FY 2012. Accordingly, in FY 2013, triggers were associated with the qualification rates of White, Asian, and Native Hawaiian Females, which were different than those present in FY 2012.

Also, triggers have been identified in the qualification rate of Black Males in the following five occupational series since FY 2011: 0028 Environmental Protection Specialist, 0301 Misc Administration and Program Specialist, 0343 Management/Program Analyst, 0401 General Biological Science, and 0819 Environmental Engineer.

For more detailed information about the specific race/national origin and sex groups that were qualified for major occupation

positions at rates lower than their application rates, please see the following chart:

<b>Race, National Origin and Sex</b>	<b>Occupational Series</b>
Hispanic Males	0028, 0301, 0343, 0401, 1301
Hispanic Females	0819
White Males	0028, 0301, 0343
White Females	0819
Black Males	0028, 0301, 0343, 0401, 0819, 1301
Black Females	0301, 0401, 0819
Asian Males	1301
Asian Females	0301
Native Hawaiian Males	0301, 0819
Native Hawaiian Females	1301
American Indian Males	0301, 0028, 0343, 0401, 0819, 1301
American Indian Females	0028, 0401
Two or More Race Males	0301, 0343, 0819
Two or More Race Females	0028, 0301, 0819, 1301

In light of this data, EPA will continue to examine whether barriers to equal employment opportunity exist. In particular, EPA will try to determine whether an Agency policy or practice is causing certain race/national origin and sex groups to be qualified for major occupation positions at rates that are less than their application rate. EPA has planned a number of activities to address the aforementioned triggers. After these planned activities are completed, EPA will evaluate whether they have impacted the triggers noted above.

### **Selection**

EPA looked at the selection rate for major occupations by comparing it to the qualification rates of the respective population. The selection rates of Hispanic Females were higher than their qualification rates in all major occupation series. This is notable because triggers had been identified in the selection rates of Hispanic Females in 3 major occupational series in FY 2012.

In FY 2013, the selection rates of Hispanic Males were no longer lower than their qualification rates in 0028 Environmental Protection Specialist, 0401 General Biological

Science, 0819 Environmental Engineer; unlike the results of the FY 2012 analyses.

In contrast, the 2013 selection rates of Asian Males and Females, and Two or More Race Females were lower than their qualification rates in every major occupation series. This appeared to be a continuation of the FY 2012 trend, in which triggers were associated with the selection rates of Asian Males in every major occupational series. In FY 2013, triggers were also noted in the selection rate of Asian and Two or More Race Females, which were not noted in FY 2012.

Further, since FY 2011, the selection rate of Asian Females was lower than their qualification rate in 0301 Miscellaneous Administration and Program Specialist and 1301 Physical/Environmental Scientist.

For more detailed information about the specific race/national origin and sex groups that were selected for major occupation positions at rates lower than their qualification rates, please see the following chart:

<b>Race, National Origin and Sex</b>	<b>Occupational Series</b>
Hispanic Males	0301, 0343
White Males	0301
White Females	0819, 1301
Black Males	0028, 0301, 0401, 0819, 1301
Black Females	0343, 0401
Asian Males	0028, 0301, 0343, 0401, 0819, 1301
Asian Females	0028, 0301, 0343, 0401, 0819, 1301
Native Hawaiian Males	0028, 0301, 0401, 0819, 1301
Native Hawaiian Females	0028, 0301, 0343
American Indian Males	0028, 0301, 0343, 0819, 1301
American Indian Females	0301, 0343, 0401, 0819, 1301
Two or More Race Males	0028, 0401, 0819, 1301
Two or More Race Females	0028, 0301, 0343, 0401, 0819, 1301

In light of this data, EPA will continue to examine whether barriers to equal employment opportunity exist. In particular, EPA will try to determine whether an Agency policy or practice is causing certain race/national origin and sex groups selected for major occupation positions at rates that are less than their

	<p>qualification rate. EPA has planned a number of activities to address the aforementioned triggers, which are detailed below and include tracking the use of hiring/interview panels to increase their prevalence throughout EPA. After these planned activities are completed, EPA will evaluate whether they have impacted the triggers noted above.</p>
<p><b>STATEMENT OF IDENTIFIED BARRIER:</b> Provide a succinct statement of EPA policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>At this time, EPA continues to investigate whether any specific policy, practice, or procedure is causing any of the identified lower than expected participation rates. In FY 2013, EPA implemented the following planned activities to determine what may have caused the less than anticipated application, qualification, and selection rates: 1) created a formal diversity and inclusion council with visible leadership involvement to ensure implementation of the Diversity and Inclusion Strategic Plan; 2) created a list of diverse recruiting sources so that EPA job announcements published on USAJobs would be sent to them; and 3) compiled and posted a list of EPA's Memorandum Of Understanding with MAIs, to provide greater transparency and better leverage the MAI partnerships. The improvement in the application rate of Hispanic Males; the qualification rate of Asian Males; and the selection rate of Hispanic Females may possibly be the result of EPA's FY 2013 planned activities.</p> <p>Nonetheless, EPA's application, qualification, and selection rates suggest that it should closely examine: 1) its outreach and recruitment policies, practices and procedures for the 0343 Management/Program Analyst occupational series to determine whether any agency policy, practice or procedure is causing certain race/national origin and sex groups not to apply; 2) its qualification policies and practices for the 0301 Miscellaneous Administration and Program Specialist and 0401 General Biological Science to determine whether any agency policy, practice or procedure is causing certain race/national origin and sex groups not to be found qualified for these positions; and 3) its selection policies and practices for all major occupational series to determine whether any agency policy, practice or procedure is causing certain race/national origin and sex groups not to be selected for positions.</p>
<p><b>OBJECTIVE:</b> State the alternative or revised Agency policy, procedure or practice to be implemented to correct the undesired condition.</p>	<p>EPA will continue its analysis of the hiring process, including recruitment, qualification and selection, associated with the above-identified lower than expected participation rates for several occupational series.</p>

RESPONSIBLE OFFICIAL:	Director of Office of Diversity, Advisory Committee Management and Outreach Management and Outreach Director of Human Resources Director of Office of Civil Rights Deputy Civil Rights Officials	
DATE OBJECTIVE INITIATED:	February 15, 2011	
TARGET DATE FOR COMPLETION OF OBJECTIVE:	September 30, 2015	
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)	
The Office of Human Resources will implement its plan to market the creation and benefits of individual development plans to employees and supervisors.	<b>Completed February 2013</b>	
Create a formal diversity and inclusion council with visible leadership involvement to ensure implementation of the Diversity and Inclusion Strategic Plan.	<b>Completed July 2013</b>	
The Office of Diversity, Advisory Committee Management and Outreach will compile a list of diverse recruiting sources for Shared Service Centers to send copies of EPA job announcements published on USAJobs.	<b>Completed September 2013</b>	
The Office of Diversity, Advisory Committee Management and Outreach will compile and post a list of EPA's Memorandum Of Understanding with MAIs, to provide greater transparency and better leverage the MAI partnerships.	<b>Completed September 2013</b>	
The Office of Diversity, Advisory Committee Management and Outreach in consultation with Senior Management will complete a Diversity Roadmap which will set forth timelines, action items, and	<b>Completed October 2013</b>	



specific deliverables based on the Diversity and Inclusion Strategic Plan.	
The Office of Human Resources will utilize two surveys to establish baseline data going back through FY 2012 that captures: 1) EPA hiring managers' satisfaction with selected applicants (survey instrument: OPM Chief Human Capital Officer's 6-Month Management Hiring Satisfaction Survey); and 2) Satisfaction of EPA new hires with their new positions (survey instrument: components of the existing EPA New Hire Survey).	<b>Completed November 2013</b>
The Office of Diversity, Advisory Committee Management and Outreach will issue Agency-wide guidance on using the Dashboard.	<b>Completed December 2013</b>
The Office of Civil Rights will finalize a survey to collect data related to the use and composition of hiring/interview panels from the last quarter of FY 12 to the first three quarters of FY 13.	June 2014
Support a "One Great Place to Work Initiative" committing EPA to foster a work environment that nurtures and advances the talents, drive, and interests of all employees. This campaign is built around three principal areas: Supportive Work Environments, Professional Development, and Benefits and Amenities.	March 2014
The Office of Human Resources will update the guidebook on hiring flexibilities and authorities and ensure that the updated information is broadly distributed to EPA selecting officials.	March 2014
The Office of Human Resources will update and finalize the guidebook on hiring flexibilities and authorities, ensure that the updated information is broadly distributed to EPA selecting officials, and launch in-person presentations throughout EPA Regions and AAships.	March 2014
Office of Civil Rights and Office of Human Resources will evaluate the data from the Management Hiring Satisfaction Survey to determine whether there are any procedural barriers associated with the development of vacancy announcements and outreach efforts.	August 2014

<p>The Office of Administration and Resources Management will provide Agency-wide SEPM training to enhance proficiency in furthering diversity, inclusion and equal employment opportunities.</p>	<p>June 2014</p>
<p>The Office of Diversity, Advisory Committee Management and Outreach will develop a targeted outreach strategy detailing Agency-wide outreach efforts for developmental opportunities.</p>	<p>June 2014</p>
<p>The Office of Diversity, Advisory Committee Management and Outreach will revise the Diversity Dashboard to use datasets consistent with those used in the MD-715 report in order to increase the utilization of the Diversity Dashboard in developing and monitoring the effectiveness of targeted outreach strategies.</p>	<p>June 2014</p>
<p>The Office of Human Resources and Office of Civil Rights will analyze: 1) EPA's recruitment policies and practices for the 0301 Miscellaneous Administration and Program Specialist, 0343 Management/Program Analyst, 0401 General Biological Science, 0819 Environmental Engineer, and 1031 Physical Scientist/Environmental Scientist occupational series to determine whether any agency policy, practice or procedures is causing some individuals not to apply for positions; 2) its qualification policies and practices for all major occupational series to determine whether any agency policy, practice or procedure is causing the triggers associated with the qualification rates; and 3) its selection policies and practices for all major occupational series to determine whether any agency policy, practice or procedure is causing the triggers associated with the selection rates.</p>	<p>August 2014</p>
<p>The Office of the Director of Human Resources will develop, in coordination with the Associate Assistant Administrator for Diversity, Outreach and Collaboration, Director of Office of Civil Right and the Office of General Counsel, a strategic recruitment plan and guidance document, which will be disseminated to all supervisors in EPA.</p>	<p>September 2014</p>
<p>The Office of Civil Rights will collaborate with the Office of Enforcement and Compliance Assurance, Office of General Counsel, and Office of Human Resources to create a process to collect, retain, and analyze applicant flow data for Series 0905 Attorney positions.</p>	<p>December 2014</p>

<p>EPA will evaluate the effectiveness of its strategic recruitment plan and guidance document and make necessary modifications or changes.</p>	<p>September 2015</p>
<p><b>Report of Accomplishments and Modifications to Objective</b></p>	
<p>Despite the impact the FY 2013 budget constraints had on the hiring in EPA's major occupational series, EPA is pleased to report some improvements in the application, qualification, and selection rates of certain race/national origin and sex groups were accomplished. In particular, the triggers noted in the application rates of Hispanic Males and the selection rates of Hispanic Females diminished in FY 2013. EPA believes that these improvements may be the result of its completion of several FY 2013 planned activities.</p> <p>In July 2013, the Office of Administration and Resources Management (OARM) created the Diversity and Inclusion Advisory Committee (DIAC), a formal diversity and inclusion council with visible leadership involvement to ensure that the Diversity and Inclusion Strategic Plan is implemented. In September 2013, the Office of Diversity, Advisory Committee Management and Outreach (ODACMO) provided EPA employees with the opportunity to update their race and national origin information. By increasing the accuracy of employee race and national origin information, this effort improved the quality of the data necessary to determine whether barriers exist to equal employment opportunity in the hiring of new employees.</p> <p>In addition, ODACMO and Shared Service Centers collaboratively created a list of diverse recruiting sources so that EPA job announcements published on USAJobs would be sent to them. The goal is to create a Standard Operating Procedure (SOP), which requires Shared Service Centers to provide every EPA vacancy announcement to diverse recruiting sources. Likewise, ODACMO compiled and posted a list of EPA's Memorandum Of Understanding with MAIs, to improve the utilization of Minority Academic Institutions (MAIs) partnerships.</p> <p>For example, EPA routinely provides job announcements to North Carolina Central University and in FY 2013, it hosted a: 1) networking event at City College of New York, a Hispanic-Serving Institution; and 2) career fair for the National Society of Black Engineers and the American Indian Society of Engineers and Scientists.</p>	

## PART I-2: Promotions

STATEMENT OF  
CONDITION THAT WAS  
A TRIGGER FOR A  
POTENTIAL BARRIER:

Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?

Data comparisons between the application, qualification, and selection rates for internal competitive promotions in some major occupations revealed instances of lower than expected application, qualification, and/or selection rates.

## BARRIER ANALYSIS:

Provide a description of the steps taken and data analyzed to determine cause of the condition.

In light of this trigger, EPA reviewed the statistical data associated with internal promotions (Table A9) for employees in six of EPA's largest occupational categories. In addition, EPA reviewed its applicant flow data and analysis from 2011 and 2012. Although the exhaustive list of triggers is provided in each personnel transaction section, certain triggers were highlighted for illustrative purposes but not because they were more important or worse than other triggers.

The seven largest occupations include 0028 Environmental Protection Specialist, 0301 Miscellaneous Administration and Program Specialist, 0343 Management/Program Analyst, 0401 General Biological Science (Research), 0819 Environmental Engineer (Research), 0905 General Attorney, and 1301 Physical/Environmental Scientist (Research). Although General Attorneys in Series 0905 constitute one of EPA's major occupations, data could not be gathered for this job series because of the unique characteristics that apply to the selection process associated with excepted service positions. As mentioned in the planned activities noted below, EPA plans to develop a process to collect data for 0905 General Attorneys in 2014.

**Application**

EPA looked at participation rates of groups in major occupations by race, national origin, and sex (Table A6) to the representation of applicants for internal competitive promotions (Table A9). EPA recognizes that not every person in a major occupation may actually apply for an internal competitive

promotion, but EPA elected to use this as a proxy for the application rate, for purposes of this report only.

In FY 2013, White Males internal promotion application rate is lower than their participation rate in only one major occupational series, which is a significant improvement from FY 2012. Likewise, in FY 2013, fewer triggers were identified in the application rates of White Females, Black Males and Females, Asian Females, and Native Hawaiian Females than in FY 2012.

However, in FY 2013, triggers were noted in the application rates of Hispanic Males and Females, and American Indian Males in the following occupational series: 1301 Physical Scientist and 0401 General Biologist, which were not present in FY 2013 when these race/national origin and sex groups experienced no triggers in any occupational series.

For more detailed information about the specific race/national origin and sex groups that applied for internal promotions at rates lower than their representation in the relevant occupations please see the following chart:

<b>Race, National Origin and Sex</b>	<b>Occupational Series</b>
Hispanic Males	1301
Hispanic Females	1301
White Males	0819
White Females	0028, 0301,0343,0401,1301
Black Males	0819, 1301
Black Females	0028, 0301, 0343, 0819, 1301
Asian Males	0343, 0819, 1301
Asian Females	0301,0401,0819
Native Hawaiian Males	0301, 0401
Native Hawaiian Females	0028, 0819, 1301
American Indian Males	0401
American Indian Females	0028, 0343, 0401, 0819, 1301
Two or More Race Males	1301
Two or More Race Females	0401

In light of this data, EPA will continue to examine whether barriers to equal employment opportunity exist. In particular, EPA will determine whether an Agency policy, practice or procedure is causing certain race/national origin and sex groups to apply for promotions in major occupations at rates that are less than anticipated. EPA has planned a number of activities to

address the aforementioned triggers, which are detailed below and include marketing the creation and benefits of individual development plans to employees and supervisors. After these planned activities are completed, EPA will evaluate whether they have impacted the triggers noted above.

### **Qualification**

EPA looked at the qualification rate for internal promotions by comparing it to the application rates of the respective population. EPA experienced a few small successes in the qualification rates for major occupational series. For instance, in FY 2013, the qualification rates of Hispanic Females and American Indian Males was lower than their application rates in less major occupations than in FY 2012. Similarly, triggers associated with the qualification rates of Hispanic Females decreased from being present in three major occupational series in FY 2012 to one major occupational series in FY 2013.

However, the qualification rates of Hispanic and Black males, and Two or More Race Females were lower than their application rates in every major occupation series. Although the same trigger was associated with Hispanic Males in FY 2012, neither Black Males nor Two or More Race Females had qualification rates that were lower than their application rates in every major occupation series in FY 2012.

For more detailed information about the specific race/national origin and sex groups that are qualified for major occupation positions at rates lower than their application rates, please see the following chart:

<b>Race, National Origin and Sex</b>	<b>Occupational Series</b>
Hispanic Males	0028, 0301, 0343, 0401, 0819, 1301
Hispanic Females	0401
White Males	0028, 0301, 0343, 0401, 0819
Black Males	0028, 0301, 0343, 0401, 0819, 1301
Black Females	0028, 0401, 0819
Asian Males	0301, 0343, 0819, 1301
Asian Females	0401, 1301
Native Hawaiian Males	0343, 0819
Native Hawaiian Females	0028
American Indian Males	0301, 0819

American Indian Females	0301, 0343, 0401
Two or More Race Males	0028, 0301, 0343, 0401
Two or More Race Females	0028, 0301, 0343, 0401, 0819, 1301

In light of this data, EPA will continue to examine whether barriers to equal employment opportunity exist. In particular, EPA will determine whether an Agency policy or practice is causing certain race/national origin and sex groups to be deemed qualified for major occupation internal promotions at rates that are less than their application rate. EPA has planned a number of activities to address the aforementioned triggers. These activities are referenced below and include conducting SEPM training to enhance proficiency in furthering diversity, inclusion and equal employment opportunities. After these planned activities are completed, EPA will evaluate whether they have impacted the triggers noted above.

### **Selection**

EPA looked at the selection rate for internal promotions by comparing it to the qualification rates of the respective population. EPA experienced a few small successes with selection rates. Specifically, in FY 2013, triggers were associated with the selection rates of Hispanic Males and Females, and Black Females in less major occupational series than in FY 2012. In particular, the amount of triggers noted for Hispanic and Black Females was nearly cut in half from FY 2012 to 2013.

However, the triggers associated with the selection rates of Black Males, Asian Females, Native Hawaiian Males and Females, American Indian Males and Females, and Two or More Race Males appears to have increased. In FY 2013, the selection rates of Black Males, Asian Females, Native Hawaiian Males and Females, American Indian Males and Females, and Two or More Race Males were lower than their qualification rates in more major occupational series than in FY 2012. Moreover, in FY 2011, no triggers were noted in the selection rates of Native Hawaiian Males and Females.

For more detailed information about the specific race/national origin and sex groups that are selected for major occupation positions at rates lower than their qualification rates, please see the following chart:

	<b>Race, National Origin and Sex</b>	<b>Occupational Series</b>
	Hispanic Males	0301, 0343
	Hispanic Females	0028, 0301
	White Males	0028,0343, 0401, 1301
	White Females	0301, 0819, 1301
	Black Males	0028, 0301,0401,0819
	Black Females	0343
	Asian Males	0028,0301, 0401, 0819
	Asian Females	0028, 0301, 0343, 0819, 1301
	Native Hawaiian Males	0028, 0819
	Native Hawaiian Females	0301
	American Indian Males	0028, 1301
	American Indian Females	0401
	Two or More Race Males	0028, 0301, 0343, 0401,0819
	Two or More Race Females	0028, 0301, 0343, 0401, 0819
	<p>In light of this data, EPA will continue to examine whether barriers to equal employment opportunity exist. In particular, EPA will determine whether an Agency policy or practice is causing certain race/national origin and sex groups to be selected for major occupation internal promotions at rates that are less than their qualification rate. EPA has planned a number of activities to address the aforementioned triggers; these activities are referenced below and include creating a survey to evaluate the use of hiring/interview panels. After these planned activities are completed, EPA will evaluate whether they have impacted the triggers noted above.</p>	
<p><b>STATEMENT OF IDENTIFIED BARRIER:</b></p> <p>Provide a succinct statement of EPA policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>At this time, EPA continues to evaluate whether any specific Agency policy, practice, or procedure is causing any of the identified lower than expected participation rates. In FY 2013, EPA implemented several planned activities to examine whether a barrier to equal employment opportunity existed including: 1) implemented its plan to market the creation and benefits of individual development plans to employees and supervisors; 2) created a formal diversity and inclusion council with visible leadership involvement to ensure implementation of the Diversity and Inclusion Strategic Plan; 3) compiled a list of diverse recruiting sources for Shared Service Centers to send copies of EPA job announcements published on USAJobs; 4) compiled and posted a list of EPA's Memorandum Of Understanding with MAIs to better leverage the MAI partnerships; and 5) created an electronic repository of EPA</p>	



	<p>mentorship programs. The improvement in the application, qualification, and selection rates of White Males, and Hispanic and Black Females in certain major occupational series may be the result of EPA's FY 2013 planned activities.</p> <p>Nonetheless, EPA's application, qualification, and selection rates suggest that it should closely examine: 1) its policies, practices, and procedures related to internal announcements of occupational series to determine whether any Agency action is causing the lower than expected application rates; and 2) its hiring policies, practices, and procedures for all major occupational series to determine whether any Agency action is causing the lower qualification and selection rates.</p>	
<p><b>OBJECTIVE:</b></p> <p>State the alternative or revised Agency policy, procedure or practice to be implemented to correct the undesired condition.</p>	<p>EPA will continue its analysis of the application, qualification and selection policies and practices associated with the above-identified lower than expected qualification and selection rates for several occupational series.</p>	
<p><b>RESPONSIBLE OFFICIAL:</b></p>	<p>Director of Office of Diversity, Advisory Committee Management and Outreach          Director of Human Resources          Director of Office of Civil Rights          Deputy Civil Rights Officials</p>	
<p><b>DATE OBJECTIVE INITIATED:</b></p>	<p>February 15, 2011</p>	
<p><b>TARGET DATE FOR COMPLETION OF OBJECTIVE:</b></p>	<p>September 30, 2015</p>	
<p><b>PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:</b></p>	<p>The Office of Human Resources will implement its plan to market the creation and benefits of individual development plans to employees and supervisors.</p>	<p><b>TARGET DATE</b> (Must be specific)</p>
		<p><b>Completed</b> <b>February 2013</b></p>

Create a formal diversity and inclusion council with visible leadership involvement to ensure implementation of the Diversity and Inclusion Strategic Plan.	<b>Completed July 2013</b>
The Office of Diversity, Advisory Committee Management and Outreach will compile a list of diverse recruiting sources to which Shared Service Centers will send copies of EPA job announcements published on USAJobs.	<b>Completed September 2013</b>
The Office of Diversity, Advisory Committee Management and Outreach will compile and post a list of EPA's Memorandum Of Understanding with MAIs, to better leverage the MAI partnerships.	<b>Completed September 2013</b>
The Office of Diversity, Advisory Committee Management and Outreach will create an electronic repository of EPA mentorship programs.	<b>Completed September 2013</b>
The Office of Diversity, Advisory Committee Management and Outreach in consultation with Senior Management will complete a Diversity Roadmap which will set forth timelines, action items, and specific deliverables based on the Diversity and Inclusion Strategic Plan.	<b>Completed October 2013</b>
The Office of Diversity, Advisory Committee Management and Outreach will issue Agency-wide guidance on using the Dashboard.	<b>Completed December 2013</b>
The Office of Civil Rights will finalize a survey to collect data related to the use and composition of hiring/interview panels from the last quarter of FY 12 to the first three quarters of FY 13.	June 2014
Support a "One Great Place to Work Initiative" committing EPA to foster a work environment that nurtures and advances the talents, drive, and interests of all employees. This campaign is built around three principal areas: Supportive Work Environments, Professional Development, and Benefits and Amenities.	March 2014

The Office of Human Resources will update the guidebook on hiring flexibilities and authorities and ensure that the updated information is broadly distributed to EPA selecting officials.	March 2014
The Office of Human Resources will update and finalize the guidebook on hiring flexibilities and authorities, ensure that the updated information is broadly distributed to EPA selecting officials, and launch in-person presentations throughout EPA Regions and AAships.	March 2014
Office of Civil Rights and Office of Human Resources will evaluate the data from the Management Hiring Satisfaction Survey to determine whether there are any procedural barriers associated with the development of vacancy announcements and outreach efforts.	August 2014
The Office of Administration and Resources Management will provide Agency-wide SEPM training to enhance proficiency in furthering diversity, inclusion and equal employment opportunities.	June 2014
The Office of Diversity, Advisory Committee Management and Outreach will develop a targeted outreach strategy detailing Agency-wide outreach efforts for developmental opportunities.	June 2014
The Office of Human Resources and Office of Civil Rights will analyze: 1) its recruitment policies, practices, and procedures for the 0301 Miscellaneous Administration and Program Specialist, 0343 Management/Program Analyst, 0401 General Biological Science, 0819 Environmental Engineer, and 1031 Physical Scientist/Environmental Scientist occupational series to determine whether they are causing the triggers; 2) its qualification policies and practices for all major occupational series to determine whether they are causing the triggers; and 3) its selection policies and practices for all major occupational series to determine whether they are causing the triggers.	August 2014
The Office of the Director of Human Resources will develop, in coordination with the Associate Assistant Administrator for Diversity, Outreach and Collaboration, Director of Office of Civil Right and the Office of General Counsel, a strategic recruitment plan	September 2014

and guidance document, which will be disseminated to all supervisors in EPA.	
The Office of Civil Rights will collaborate with the Office of Enforcement and Compliance Assurance, Office of General Counsel, and Office of Human Resources to create a process to collect, retain, and analyze applicant flow data for Series 0905 Attorney positions.	December 2014
The Office of Civil Rights will collaborate with the Office of Human Resources to analyze whether any agency policy, practice or procedure related to internal competitive promotions is causing: 1) lower than expected application rates; 2) lower than expected qualification rates; and 3) lower than expected selection rates.	December 2014
EPA will evaluate the effectiveness of its strategic recruitment plan and guidance document and make necessary modifications or changes.	September 2015
<b>Report of Accomplishments and Modifications to Objective</b>	
<p>EPA is pleased to report that it accomplished some improvements in the application, qualification, and selection rates of certain race/national origin and sex groups in FY 2013. In particular, the triggers noted in the application rates of White Males, qualification rates of Hispanic Females, and selection rates of Hispanic and Black Females diminished in FY 2013. EPA believes that these improvements may be the result of its completion of several FY 2013 planned activities.</p> <p>The Office of Diversity, Advisory Committee Management and Outreach (ODACMO) embarked on major initiatives: to increase the availability and access to career development opportunities; and leverage EPA's cadre of SEPMs to advance EPA's workplace Diversity and Inclusion (D&amp;I).</p> <p>In July 2013, the Office of Human Resources (OHR) and ODACMO collected and analyzed the race/national origin and sex data of participants in FY 12 and first three quarters of FY 13 Successful Leader Program, which allows every new supervisor to engage in a full year of development activities designed to enhance their skills and help them transition successfully into their new leadership roles. This analysis of participants in the Successful Leader Program will enable EPA to determine whether barriers exist regarding the policies, practices and procedures associated with these programs.</p> <p>In February and July 2013, the OHR offered Individual Development Plan training, which provided tools for: 1) identifying individual competency strengths and possible areas for</p>	

improvement; 2) building an effective development plan; 3) identifying your support networks; 4) identifying various development activities for to support skill building; and 5) discovering sources to obtain honest and objective feedback.

In July 2013, The Office of Administration and Resources Management (OARM) created the Diversity and Inclusion Advisory Committee (DIAC), a formal diversity and inclusion council with visible leadership involvement to ensure implementation of the Diversity and Inclusion Strategic Plan. EPA believes that the DIAC will act as a strong platform of engagement on diversity and inclusion initiatives impacting EPA.

In September 2013, ODACMO provided EPA employees with the opportunity to update their race and national origin information. By increasing the accuracy of employee race and national origin information, this effort improved EPA's ability to determine whether barriers exist to equal employment opportunity in the Senior Grades.

## PART I-3: Senior Grades

STATEMENT OF  
CONDITION THAT WAS  
A TRIGGER FOR A  
POTENTIAL BARRIER:

Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?

Data comparisons between the respective feeder pools (one grade below the grade being analyzed), application, qualification, and selection rates revealed instances of lower than expected application, qualification and/or selection rates.

## BARRIER ANALYSIS:

Provide a description of the steps taken and data analyzed to determine cause of the condition.

EPA reviewed the statistical data associated with Internal Selections for Senior Level Positions (Table A11). EPA analyzed feeder pool information from Chart A4. Although the exhaustive list of triggers is provided in each personnel transaction section, certain triggers were highlighted for illustrative purposes but not because they were more important or worse than other triggers.

**Application**

EPA looked at the application rates for Senior Grade positions (GS 13, GS 14, and GS 15) by comparing them to the participation rate of the respective population at the next lower grade (e.g. the feeder pool for GS 13 Hispanic Females is their overall representation at the GS 12 level, which is a proxy for the application rates associated with applicant flow data and is used for purposes of this report only).

The good news is that Hispanic Males, Black Males, Native Hawaiian Males, American Indian Males, Two or More Races Males and Females apply for positions in numbers that exceed their representation in the feeder pool.

In addition, White Males are applying for positions at the GS-13 and GS-14 levels in numbers above their representation in the feeder pool. Likewise, Hispanic and Native Hawaiian Females are applying for positions at the GS-14 and 15 levels in numbers above their representation in the feeder pool.

However, the data suggests that several groups of Females apply for positions in numbers less than their representation in feeder pools, particularly at the GS-13 and GS-14 levels. This trend was also evident in the workforce data collected in FY 2011 and 2012, where triggers were identified for Females of all race/national origin groups.

For more detailed information about the specific race/national origin and sex groups that applied for Senior Grade positions at rates lower than their representation in the relevant feeder pool, please see the following chart:

<b>Race, National Origin and Sex</b>	<b>Grades</b>
Hispanic Females	GS 13
White Males	GS 15
White Females	GS 13, GS 14, GS 15
Black Females	GS 13, GS 14, GS 15
Asian Males	GS 14, GS 15
Asian Females	GS 13, GS 14, GS 15
Native Hawaiian Females	GS 13, GS 14, GS 15
American Indian Females	GS 13, GS 14, GS 15

In light of this data, EPA will continue to examine whether barriers to equal employment opportunity exist. In particular, EPA will evaluate whether any Agency policy, practice, or procedure is causing the lower than expected application rates for Senior Grade positions. EPA has planned a number of activities to address the triggers referenced below, which includes creating a targeted outreach strategy for developmental opportunities. After these planned activities are completed, EPA will evaluate whether they have impacted the triggers noted above.

### **Qualification**

EPA looked at the qualification rates for Senior Grade positions (GS 13, GS 14, and GS 15) by comparing them to the application rates.

Although White, Asian and American Indian Females are qualified for GS 13, GS 14, and GS 15 positions at numbers that exceed their representation in the feeder pool, triggers are associated with the qualification rate of every other race/national origin and sex group in at least one grade level.

In particular, Males are qualified for positions in numbers less than their representation in the feeder pools at the GS-13 and GS-15 levels. At the GS-13 level, this trend was also evident in FY 11 and 12, where triggers were identified for Hispanic, White, Black, American Indian, and Two or More Race Males.

For more detailed information about the specific race/national origin and sex groups that were found qualified at levels below their respective application rates, please see the following chart:

<b>Race, National Origin and Sex</b>	<b>Grades</b>
Hispanic Males	GS 13, GS 14, GS 15
Hispanic Females	GS 14
White Males	GS 13, GS 15
Black Males	GS 13, GS 14, GS 15
Black Females	GS 14
Asian Males	GS 13
Native Hawaiian Males	GS 15
Native Hawaiian Females	GS 14
American Indian Males	GS 13, GS 14 GS 15
Two or More Race Males	GS 13, GS 14
Two or More Race Females	GS 13 and GS 15

In light of this data, EPA will continue to examine whether barriers to equal employment opportunity exist. In particular, EPA will continue evaluating whether an Agency policy practice or procedure is causing certain race/national origin and sex groups to be qualified for Senior Grade positions at rates that are less than anticipated. EPA has planned a number of activities to address the aforementioned triggers, which are referenced below and include providing training to employees about how to market and brand their professional skills and experience. After these planned activities are completed, EPA will evaluate whether they have impacted the triggers noted above.

### **Selection**

EPA looked at the selection rate for Senior Grade positions (GS 13, GS 14, and GS 15) by comparing them to qualification rate

Although White Males are selected for GS 13, GS 14, and GS 15 positions at numbers that exceed their representation in the



feeder pool, triggers are associated with the selection rate of every other group in at least one grade level.

In the case of Asian Females, the selection rate is less than their qualification rate at every Senior Grade level. In FY 2012, Asian Females were also noted as having triggers associated with their selection rate at every Senior Grade level.

Triggers were also associated with the selection rates of Black, Asian, American Indian, and Two or More Race Males at two Senior Grade levels in FY 2013.

For more detailed information about the specific race/national origin and sex groups that were selected at levels below their respective qualification rates, please see the following chart:

<b>Race, National Origin and Sex</b>	<b>Grades</b>
Hispanic Males	GS 15
Hispanic Females	GS 14, GS 15
White Females	GS 13
Black Males	GS 13, GS 14
Black Females	GS 15
Asian Males	GS 14, GS 15
Asian Females	GS 13, GS 14, GS 15
Native Hawaiian Males	GS 13, GS 14
Native Hawaiian Females	GS 15
American Indian Males	GS 14, GS 15
American Indian Females	GS 13
Two or More Race Males	GS 14, GS 15
Two or More Race Females	GS 13, GS 14

In light of this data, EPA will continue to examine whether barriers to equal employment opportunity exist. In particular, EPA will evaluate whether any Agency policy, practice or procedure is causing certain race/national origin and sex groups to be selected for Senior Grade positions at rates that are less than anticipated. EPA has planned a number of activities to address the aforementioned triggers, which are referenced below and include circulating updated information about hiring authorities and flexibilities. After these planned activities are completed, EPA will evaluate whether they have impacted the triggers noted above.

<p><b>STATEMENT OF IDENTIFIED BARRIER:</b></p> <p>Provide a succinct statement of EPA policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>At this time, it is not possible to identify a specific policy, practice or procedure which may be causing any of the identified lower than expected participation rates. However, the data suggests that EPA should more closely examine: 1) its career development opportunities to determine whether they impact the ability of certain groups to compete for Senior grades; 2) its hiring process and practices for all Senior Grade positions to determine whether an Agency action is causing the triggers associated with applications, qualifications, and selections.</p>
<p><b>OBJECTIVE:</b></p> <p>State the alternative or revised Agency policy, procedure or practice to be implemented to correct the undesired condition.</p>	<p>EPA will continue its analysis of the application, qualification, and selection process for Senior Grade positions associated with the above-identified lower than expected participation rates.</p>
<p><b>RESPONSIBLE OFFICIAL:</b></p>	<p>Director of Office of Civil Rights  Director of Office of Diversity, Advisory Committee Management, and Outreach  Director of Human Resources  Deputy Civil Rights Officials</p>
<p><b>DATE OBJECTIVE INITIATED:</b></p>	<p>February 15, 2011</p>
<p><b>TARGET DATE FOR COMPLETION OF OBJECTIVE:</b></p>	<p>September 30, 2016</p>

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)
The Office of Human Resources will implement its plan to market the creation and benefits of individual development plans to employees and supervisors.	<b>Completed February 2013</b>
Create a formal diversity and inclusion committee with visible leadership involvement to ensure implementation of the Diversity and Inclusion Strategic Plan.	<b>Completed July 2013</b>
The Office of Human Resources and Office of Diversity Advisory Committee Management Office will collect and analyze the race/national origin and sex data of participants in FY 12 and first three quarters of FY 13 Successful Leader Program.	<b>Completed July 2013</b>
The Office of Diversity, Advisory Committee Management and Outreach will compile a list of diverse recruiting sources for Shared Service Centers to send copies of EPA job announcements published on USAJobs.	<b>Completed September 2013</b>
The Office of Diversity, Advisory Committee Management and Outreach will compile and post a list of EPA's Memorandum Of Understanding with MAIs, to better leverage the MAI partnerships.	<b>Completed September 2013</b>
The Office of Diversity, Advisory Committee Management and Outreach will create an electronic repository of EPA mentorship programs.	<b>Completed September 2013</b>
The Office of Human Resources will utilize two surveys to establish baseline data going back through FY 2012 that captures: 1) EPA hiring managers' satisfaction with selected applicants (survey instrument: OPM Chief Human Capital Officer's 6-Month Management Hiring Satisfaction Survey); and 2) Satisfaction of EPA new hires with their new positions (survey instrument: components of the existing EPA New Hire Survey).	<b>Completed November 2013</b>
The Office of Diversity, Advisory Committee Management and Outreach in consultation with Senior Management will complete a	<b>Completed October 2013</b>

Diversity Roadmap which will set forth timelines, action items, and specific deliverables based on the Diversity and Inclusion Strategic Plan.	
Support a “One Great Place to Work Initiative” committing EPA to foster a work environment that nurtures and advances the talents, drive, and interests of all employees. This campaign is built around three principal areas: Supportive Work Environments, Professional Development, and Benefits and Amenities.	March 2014
The Office of Human Resources will update and finalize the guidebook on hiring flexibilities and authorities, ensure that the updated information is broadly distributed to EPA selecting officials, and launch in-person presentations throughout EPA Regions and AAships.	March 2014
Office of Civil Rights and Office of Human Resources will evaluate the data from the Management Hiring Satisfaction Survey to determine whether there are any procedural barriers associated with the development of vacancy announcements and outreach efforts.	June 2014
The Office of Diversity, Advisory Committee Management and Outreach will develop a targeted outreach strategy detailing Agency-wide outreach efforts for career developmental opportunities.	June 2014
The Office of Human Resources will launch a Learning Management System to track Agency employees’ participation in career development activities, including trainings, details, and e-learning.	September 2014
The Office of the Director of Human Resources will develop, in coordination with the Associate Assistant Administrator for Diversity, Outreach and Collaboration, Director of Office of Civil Right and the Office of General Counsel, a strategic recruitment plan and guidance document, which will be disseminated to all supervisors in EPA.	September 2014
EPA will evaluate the effectiveness of it strategic recruitment plan and guidance document and make necessary modifications or changes.	September 2015

The Office of Human Resources will circulate a report highlighting the career development data collected in the Learning Management System.	September 2016
<b>Report of Accomplishments and Modifications to Objective</b>	
<p>Although EPA's budget constraints impacted hiring for the Senior Grades, it provided us with the foundation to primarily focus on enhancing career development programs, which will provide employees with the opportunity to obtain the information and develop the competencies needed to apply, qualify, and be selected for Senior Grade positions. It is EPA's belief that this effort will facilitate the workforce's continued growth and advancement.</p> <p>In February and July 2013, the Office of Human Resources (OHR) offered Individual Development Plan training, which provided tools for: 1) identifying individual competency strengths and possible areas for improvement; 2) building an effective development plan; 3) identifying your support networks; 4) identifying various development activities for to support skill building; and 5) discovering sources to obtain honest and objective feedback.</p> <p>In July 2013, the Office of Administration and Resources Management (OARM) created the Diversity and Inclusion Advisory Committee (DIAC), a formal diversity and inclusion council with visible leadership involvement to ensure implementation of the Diversity and Inclusion Strategic Plan. In July 2013, the Office of Human Resources and Office of Diversity, Advisory Committee Management and Outreach (ODACMO) collected and analyzed the race/national origin and sex data of participants in FY 12 and first three quarters of FY 13 Successful Leader Program. The Successful Leader Program allows every new supervisor to engage in a full year of development activities designed to enhance their skills and help them transition successfully into their new leadership roles.</p> <p>In September 2013, ODACMO provided EPA employees with the opportunity to update their race and national origin information. By increasing the accuracy of employee race and national origin information, this effort improved EPA's ability to determine whether barriers exist to equal employment opportunity in the Senior Grades. In addition, ODACMO and Shared Service Centers collaboratively created a list of diverse recruiting sources so that EPA job announcements published on USAJobs would be sent to them. The goal is to create a Standard Operating Procedure (SOP), which requires Shared Service Centers to provide every EPA vacancy announcement to diverse recruiting sources. Likewise, ODACMO compiled and posted a list of EPA's Memorandum Of Understanding with MAIs, to better leverage the MAI partnerships.</p> <p>In FY 2013, there were several initiatives implemented throughout the Agency that were designed to better prepare the existing workforce to fill Senior Grade positions. What follows are illustrative examples of such efforts: 1) OHR hiring managers and new hires evaluated their satisfaction with the hiring process, including the on-boarding process; 2) the Office of the Administrator (AO), under the guidance of the Office of Executive Services (OES),</p>	

provided several detail opportunities outside AO; 3) the Region 8, Older Worker Program (OWP) collaborated with the EEO Manager and the Emerging Leaders Network (ELN) to streamline the Cross-Generational Communication Training to develop and launch the “Knowledge Transfer Initiative” to share institutional knowledge within Region 8; 4) the Office of Air and Radiation (OAR) and the Office of Radiation and Indoor Air (ORIA) sponsored a series of seven Leadership Learning sessions for its Center Directors, including a session on “Valuing Diversity and Inclusion; and 5) ORIA offered formal and informal opportunities, including an internal “Leadership Coach,” for its management team to learn and discuss issues related to developing strong “leadership team.”

## PART I-4: Senior Executive Service

STATEMENT OF  
CONDITION THAT WAS  
A TRIGGER FOR A  
POTENTIAL BARRIER:

Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?

EPA has not acquired adequate applicant flow data to conduct a comprehensive analysis of the Senior Executive Service (SES) workforce.

## BARRIER ANALYSIS:

Provide a description of the steps taken and data analyzed to determine cause of the condition.

In the 4th quarter of FY 2011, EPA's Executive Resources Division (ERD) successfully launched its first system to collect applicant flow data related to external applicants for SES vacancies. Presently, when selections are made, retrospective analyses of applicant flow data related to determinations on best qualified candidates for the vacancies is conducted and reported.

This year, for the first time, partial external SES applicant flow data was collected and categorized by race/national origin and sex. However, this data was not included in this report, because the appropriate feeder pool was not collected.

STATEMENT OF  
IDENTIFIED BARRIER:

Provide a succinct statement of EPA policy, procedure or practice that has been determined to be the barrier of the undesired condition.

At this time, it is not possible to identify if there is a specific hiring or promotion process policy, practice, or procedure that may be impacting the representation of any group in the SES. However, EPA will collect and analyze internal applicant flow data for the SES in FY 2014.

## OBJECTIVE:

State the alternative or revised Agency policy, procedure or practice to be implemented to correct the undesired condition.

EPA will work to continue its efforts to enhance its automated data capture capabilities for internal SES hires.

RESPONSIBLE OFFICIAL:	Director of Office of Civil Rights Associate Assistant Administrator for Diversity, Outreach and Collaboration Director of Human Resources Deputy Civil Rights Officials
DATE OBJECTIVE INITIATED:	October 1, 2013
TARGET DATE FOR COMPLETION OF OBJECTIVE:	September 30, 2016
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)
Analyze and, if necessary, modify procedures for capturing data.	<b>Completed November 2013</b>
The Office of Human Resources will develop a process for collecting internal SES applicant flow data in accordance with the requirements of MD-715.	March 2014
The Office of Human Resources will launch a Learning Management System to track Agency employees' participation in career development activities, including trainings, details, and e-learning.	September 2014
The Office of Human Resources will collect internal Senior Executive Service applicant flow data in accordance with the requirements of MD-715.	September 2014
The Office of the Director of Human Resources will develop, in coordination with the Director of the Office of Diversity, Advisory Committee Management and Outreach, Director of Office of Civil Rights and the Office of General Counsel, a strategic recruitment plan	September 2014



and guidance document, which will be disseminated to all supervisors in EPA.	
The Office of Human Resources will circulate a report highlighting employees' participation in training and/or career development opportunities collected in the Learning Management System.	September 2016
The Office of Human Resources will circulate a report highlighting the career development data collected in the Learning Management System.	September 2016
<b>Report of Accomplishments and Modifications to Objective</b>	
<p>In FY 2013, EPA is pleased to report that it collected partial external applicant flow data categorized by race/national origin and sex for SES vacancies for the first time. Over 4000 applications were received in response to vacancies posted through USAJOBS. The total application rate has doubled since last year, which was the first time that EPA utilized an electronic application process for external applications.</p> <p>EPA has modified its objectives related to the SES for FY 2014. In particular, EPA will establish a process for collecting internal SES applicant flow data in accordance with the requirements of MD-715. In addition, EPA will develop the Learning Management System to track employee participation in career development opportunities, including trainings, details, and e-learning during FY 2014.</p> <p>Thereafter, a report will be circulated which highlights the data collected in the Learning Management System. EPA anticipates that the enhancement of its SES applicant flow data collection process, and system to track participation rates in supervisory training will further its ability to examine whether barriers to equal employment opportunity exist.</p>	

## PART I-5: Individuals with Targeted Disabilities

**STATEMENT OF  
CONDITION THAT WAS  
A TRIGGER FOR A  
POTENTIAL BARRIER:**

Provide a brief narrative describing the condition at issue.

How was the condition recognized as a potential barrier?

Data comparisons between FY 2012 and FY 2013 indicate that EPA workforce decreased by 71,053 (5.8%) employees, which included a decrease in the total number of individuals with targeted disabilities within EPA.

**BARRIER ANALYSIS:**

Provide a description of the steps taken and data analyzed to determine cause of the condition.

EPA completed Part J of this report and noted that the total number of individuals with targeted disabilities in EPA workforce declined from 227 in FY 2012 to 201 in FY 2013. In other words, the percentage of individuals with targeted disabilities declined by 11.45% from FY 2012 to FY 2013. Additionally, the total number of qualified individuals with a reportable disability declined by 7.25% from FY 2012 to FY 2013.

As indicated in Table B1, EPA lost 28 permanent employees, who were individuals with targeted disabilities; however their reasons for departing from Agency employment are unknown. To identify their motivation for departing from EPA employment, the exit interview form and process will be updated in FY 2014. A concern identified in some Action Plans was that budgetary constraints due to the sequestration, furloughs, the government shutdown, and the reduced numbers of FTEs greatly limited the hiring capabilities of managers.

EPA's National Disability Program Manager and Special Emphasis Program Managers in the Disability Action Council, Regions and AAs identified, through their MD 715 Action Plans, possible attitudinal or institutional barriers that may be causing the number of individuals with targeted disabilities to be declining. These submissions demonstrated that there are perceived attitudinal barriers, and that all Agency managers

	may not have adequate knowledge or awareness to use Schedule A hiring authorities under 5 CFR 213.3102(u) or adequate knowledge about the Workforce Recruitment Program for College Students with Disabilities. In FY 2014, EPA has numerous planned activities to address these barriers through: 1) improved training for hiring managers and human resource specialists; 2) enhanced recruitment and outreach strategies; and 3) the creation of a committee to address hiring, advancement, and retention of people with targeted disabilities.
<b>STATEMENT OF IDENTIFIED BARRIER:</b>  Provide a succinct statement of EPA policy, procedure or practice that has been determined to be the barrier of the undesired condition.	At this time, it is not possible to identify a specific policy, practice or procedure which may be causing any of the identified lower than expected participation rates. But, the data suggests that EPA should more closely examine: 1) the uniform use and training on Schedule A and 5 CFR 213.3102(u); 2) the availability of training programs on Schedule A and 5 CFR 213.3102(u); 3) the gathering of applicant flow data to the extent it is possible.
<b>OBJECTIVE:</b>  State the alternative or revised Agency policy, procedure or practice to be implemented to correct the undesired condition.	EPA will continue its analysis of the retention and selection rates of individuals with targeted disabilities to determine whether an agency policy, practice or procedure is causing the identified triggers and work towards collecting applicant flow data on people with targeted disabilities.
<b>RESPONSIBLE OFFICIAL:</b>	Director of Office of Civil Rights Director of Office of Diversity, Advisory Committee Management and Outreach Director of Human Resources Deputy Civil Rights Officials
<b>DATE OBJECTIVE INITIATED:</b>	February 15, 2011
<b>TARGET DATE FOR COMPLETION OF OBJECTIVE:</b>	September 30, 2014
<b>PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:</b>	<b>TARGET DATE</b> (Must be specific)

The Disability Program Manager developed a training toolkit which included: 1) the definition of disability and targeted disabilities; 2) ABCs of Schedule A for hiring managers, HR professionals and disability program managers; 3) the Workforce Recruitment Program (WRP) for Students with Disabilities; 4) the Computer /Electronic Accommodation Program (CAP), which provides assistive technological accommodations in the workplace for people with disabilities; and 5) disability law with federal focus based on the Americans with Disabilities Act Amendments Act of 2008 (ADAAA).	<b>Completed January 2013</b>
The Office of Human Resources will implement its plan to market the creation and benefits of individual development plans to employees and supervisors.	<b>Completed February 2013</b>
Provide Agency-wide Special Emphasis Program Managers training on how to provide briefings and brown-bag luncheons to managers on the Workforce Recruitment Plan and Schedule A hiring authority in the Regions and at Headquarters.	<b>Completed July 2013</b>
The Office of Human Resources and Office of Diversity Advisory Committee Management Office will collect and analyze the individuals with targeted disabilities data of participants in FY 12 and first three quarters of FY 13 Successful Leader Program.	<b>Completed July 2013</b>
The Office of Human Resources will carefully track EPA's use of Schedule A appointing authorities for hiring individuals with targeted disabilities.	<b>Completed September 2013</b>
The Office of Civil Rights will provide training to management and Agency LORACs throughout EPA on using the toolkit as well as on facilitating requests for reasonable accommodation for applicants and employees with disabilities.	<b>Completed September 2013</b>
In an effort to improve the accuracy of data on individuals with disabilities, the Office of Diversity, Advisory Committee Management and Outreach will provide all employees the opportunity to update their disability status.	<b>Completed December 2013</b>
The Office of Civil Rights and Office of Diversity, Advisory Committee Management and Outreach will continue to conduct	<b>Completed</b>

assessments on whether there are attitudinal barriers to selection and promotion opportunities by holding a series of at least 5 separate listening sessions throughout EPA with disability constituency groups. This may also include meetings with Disability Special Emphasis Program groups, EEO leaders, Local Accommodation Coordinators, Union officials, and other managers and employees.	<b>December 2013</b>
The Office of Human Resources and Office of Civil Rights will analyze: 1) the uniform use and training on Schedule A and 5 CFR 213.3102(u); 2) the availability of training programs on Schedule A use and requirement for applicants and managers; and 3) the gathering of applicant flow data to the extent it is possible.	February 2014
Support a “One Great Place to Work Initiative” committing EPA to foster a work environment that nurtures and advances the talents, drive, and interests of all employees. This campaign is built around three principal areas: Supportive Work Environments, Professional Development, and Benefits and Amenities.	March 2014
The Office of Diversity, Advisory Committee Management and Outreach will compile a list of disability recruiting sources for Shared Service Centers to send copies of EPA job announcements published on USAJobs.	March 2014
The Office of Human Resources will update the exit interview form and process to track the motivation for employees’ departure from Agency employment.	March 2014
EPA will announce a numerical goal for each Region and AAship and for EPA overall for the hiring of individuals with targeted disabilities consistent with Executive Order 13548.	April 2014
Establish a diversity committee to address hiring, advancement, and retention of people with targeted disabilities.	April 2014
<b>Report of Accomplishments and Modifications to Objective</b>	
This year, due to budgetary constraints, there were limited opportunities to hire new employees which affected the Agency’s ability to achieve its goal for individuals with targeted disabilities to represent 2% of EPA’s total workforce.	

Nonetheless, in FY 2013, the Equal Employment Opportunity (EEO) Officers and Program Management Officers (PMOs) worked with the National Disability Program Manager, Regions and AAships through their MD 715 Action Plans to identify possible attitudinal or institutional barriers that may be causing the representation of People with Targeted Disabilities (PWTD) in EPA's workforce to decline. Specifically, several EPA Regions and AAships conducted disability listening sessions including Disability Action Council, OAR, OCFO, Regions 4, 7 and 9 to discuss attitudes and potential barriers to equal employment opportunity.

At such sessions, several managers explained that their failure to utilize Schedule A hiring authority was due to budgetary constraints, which resulted in: 1) the hiring pause which halted hiring efforts; 2) the furloughs caused by the government sequestration which impacted office budgets; 3) a lack of available Full-Time Employee Equivalents (FTEs) which prohibited their office from hiring interns and permanent employees. A few managers thought that hiring people with disabilities would interfere with Merit System Protection Board (MSPB) regulations.

In addition, the Office of Civil Rights (OCR) and Office of Diversity, Advisory Committee Management and Outreach (ODACMO) met with Disability Special Emphasis Program groups, EEO leaders, Local Accommodation Coordinators and Union officials, to better assess the attitudinal barriers to selection. In these listening sessions, the participants reiterated their beliefs that many EPA managers and human resource specialists may not: 1) have adequate knowledge of the Schedule A hiring authorities under 5 CFR 213.3102(u); 2) know how to specifically use Schedule A hiring authorities; 3) know about the Persons with Disabilities and Schedule A (u) and 213.3102 Workforce Recruitment Program online database; and 4) know the benefits of hiring individuals with disabilities.

In FY 2013, EPA accomplished several planned activities that make knowledge of disability issues and tools more easily accessible to managers which might impact the triggers identified above. Specifically, in January 2013, the Disability Program Manager developed a training toolkit which included: 1) the definition of disability and targeted disabilities; 2) ABCs of Schedule A for hiring managers, human resources specialists, and disability program managers; 3) the Workforce Recruitment Program (WRP) for Students with Disabilities; 4) the Computer/Electronic Accommodation Program (CAP), which provides assistive technological accommodations in the workplace for people with disabilities; and 5) provisions of the disability law with federal focus based on the Rehabilitation Act of 1973 and the Americans with Disabilities Act Amendments Act of 2008 (ADAAA).

In 2013, the Office of Human Resources (OHR) implemented a 2013 Memorandum of Understanding Partnership with Gallaudet University, an educational institute for the hearing impaired, through which OHR and Office of Administration and Resources Management (OARM) coordinated and organized the placement of 14 hearing impaired student volunteers at EPA's Headquarters Program Offices during the 2012-2013 school year.

In April 2013, the Office of Diversity, Advisory Committee Management and Outreach (ODACMO) Disability Representative provided mock interview training for Gallaudet

University students. In July 2013, ODACMO provided a workshop to Gallaudet University students on job applications, career etiquette and expectations in the work place.

In July 2013, EPA Special Emphasis Program Managers (SEPM) also received training on how to provide briefings and brown-bag luncheons to managers on the WRP and Schedule A hiring authority in the Regions and at headquarters. The goal of these sessions was to equip managers and supervisors with the capacity to locate and hire highly qualified college students with disabilities in all academic fields and disciplines.

In September 2013, the ODACMO compiled a list of disability recruiting sources for Shared Service Centers, who thereafter, distributed all vacancy announcements to organizations that support the employment of PWTD. This targeted recruited effort resulted in Region 9 hiring 21% of their 2013 new hires through Schedule A.

Throughout 2013, the NRAC and Assistant Reasonable Accommodation Coordinator (ARAC) provided training to management and Agency LRAC on using the toolkit as well as on facilitating requests for reasonable accommodation. The NRAC conducted a total of 36 training sessions on EPA's Reasonable Accommodation Policy and Procedures, and Section 508. The training sessions were attended by managers/supervisors and employees and focused on managers'/supervisors' use of the toolkit as well as on facilitating requests for reasonable accommodation.

<b>EEOC FORM 715-01 PART J</b>	<i>U.S. Equal Employment Opportunity Commission</i> <b>FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT</b> <b>Special Program Plan for the Recruitment, Hiring, and Advancement of Individuals With Targeted Disabilities</b>									
<b>PART I Department or Agency Information</b>	1. Agency	1. US Environmental Protection Agency								
	1a. 2 <sup>nd</sup> Level Component	1a. N/A								
	1b. 3 <sup>rd</sup> Level or lower	1b. N/A								
<b>PART II Employment Trend and Special Recruitment for Individuals With Targeted Disabilities</b>	Enter Actual Number at the ...	<b>Start 9-30-2012</b>		<b>End 9-30-2013</b>		<b>Net Change</b>				
		Number	%	Number	%	Number	Rate of Change			
	Total Work Force	18,055	100.00%	17,002	100.00%	<b>-1053</b>	<b>-5.83</b>			
	Reportable Disability	1,158	6.41%	1,074	6.32%	<b>-84</b>	<b>-7.25</b>			
	Targeted Disability*	227	1.26%	201	1.18%	<b>-26</b>	<b>-11.45</b>			
	* If the rate of change for persons with targeted disabilities is not equal to or greater than the rate of change for the total workforce, a barrier analysis should be conducted (see below). Please see Part I9.									
	<b>1. Total Number of Applications Received From Persons With Targeted Disabilities during the reporting period.</b>						Data not available			
	<b>2. Total Number of Selections of Individuals with Targeted Disabilities during the reporting period.</b>						Data not available			
<b>PART III Participation Rates In Agency Employment Programs</b>										
<b>Other Employment/ Personnel Programs</b>	<b>TOTAL</b>	<b>Reportable Disability</b>		<b>Targeted Disability</b>		<b>Not Identified</b>		<b>No Disability</b>		
		#	%	#	%	#	%	#	%	
3. Competitive Promotions	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
4. Non- Competitive Promotions	<b>755</b>	<b>63</b>	<b>8.34%</b>	<b>15</b>	<b>1.99%</b>	<b>19</b>	<b>2.52%</b>	<b>673</b>	<b>89.14%</b>	
<b>5. Employee Career Development Programs - No Data Available</b>										
5.a. Grades 5 – 12	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	





## PART K: Best Practices Summary

EPA considers the following to be noteworthy best practices of our Agency:

- The establishment of Deputy Civil Rights Officials (DCROs) within each regional office and assistant administrator's office to serve as that office's primary point of accountability for effectively implementing the civil rights programs within their respective organizations, and providing senior level involvement in the development of national EEO strategies and policies.
- The formation of the Transgender Workgroup to develop a guidance document on transgender inclusion in the workplace.
- The development of a comprehensive listing of EPA Memoranda of Understanding with MAI's to better leverage the MAI partnerships.
- The creation of an electronic repository of EPA mentorship programs.
- The implementation of a plan to market the creation and benefits of individual development plans to employees and supervisors.
- The implementation of a 2013 Memorandum of Understanding Partnership with Gallaudet University, an educational institute for the hearing impaired, through which OHR and OARM coordinated and organized the placement of 14 hearing impaired student volunteers at EPA's Headquarters Program Offices during the 2012-2013 school year.
- The formation of the Diversity and Inclusion Advisory Committee (DIAC). This is a standing committee of the Executive Management Committee that provides senior leadership oversight, counsel, and recommendations concerning EPA's diversity and inclusion efforts. DIAC, which is comprised of officials from ODACMO, 2 EEO Officers, the Special Emphasis Program Managers (SEPMs), Regional representatives and headquarters officials, intends to meet quarterly to address the effectiveness of EPA's efforts to expand senior leadership diversity.
- The compilation a list of disability recruiting sources for Shared Service Centers, who thereafter, distributed all vacancy announcements to organizations that support the employment of PWTD. This targeted recruited effort resulted in Region 9 hiring 21% of their 2013 new hires through Schedule A.
- The implementation of training courses throughout the regions and AAs on the following topics: 1) the reasonable accommodation request process; 2) the interactive

process; 3) the importance of maintaining confidentiality and providing accommodations in a timely manner; and 4) union negotiated procedures.

- The development and issuance of a Section 508 training course attended by 270 managers/supervisors and 149 employees, which was offered in Regions 1, 2, 4, 5, 6, 8, 10, as well as the OEI Program Office.